

Methidathion
Analysis of Risks
to
Endangered and Threatened Salmon and Steelhead

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Summary

Methidathion is a non-systemic organophosphate insecticide/acaricide registered for use to control a wide range of sucking, leaf-eating, and scale insects. Methidathion is used on a variety of food and feed crops that include alfalfa (grown for seed), almonds, apples, apricots, artichokes, carambola, cherries, clover (grown for seed), cotton, grapefruit, hay-grass, kiwi fruit, lemons, longan, mandarins, mangos, nectarines, olives, oranges, peaches, pears, pecans, plums, prunes, safflower, sorghum, sugar apple, sunflower, timothy, and walnuts. It has very high toxicity to fish and estuarine invertebrates and, somewhat less toxicity to freshwater aquatic invertebrates.

An endangered species risk assessment is developed for federally listed Pacific salmon and steelhead. This assessment applies the findings of the Office of Pesticide Program's Environmental Risk Assessment developed for non-target fish and wildlife as part of the reregistration process to determine the potential risks to the 26 listed threatened and endangered Evolutionarily Significant Units (ESUs) of Pacific salmon and steelhead. The use of methidathion on crops may affect 10 ESUs when used according to labeled application directions, may affect but is not likely to adversely affect 9 ESUs, and will have no effect on 7 ESUs.

Introduction

This analysis was prepared by the U.S. Environmental Protection Agency (EPA) Office of Pesticides Programs (OPP) to evaluate the risks of methidathion to threatened and endangered Pacific salmon and steelhead. The format of this analysis is the same as for previous analyses. The background section explaining the risk assessment process is the same as was presented in a previous assessment for diazinon, except that we have updated our criteria for indirect effects on aquatic plant cover to bring this in line with the acute risk concerns used by the Environmental Fate and Effects Division of OPP (EFED). Several other minor wording changes have also been made that have no bearing on the technical analysis.

The general aquatic risk assessment presented in the “Interim Reregistration Eligibility Decision (IRED) methidathion” issued in April, 2002 was the starting basis for this assessment (Attachment A-1). This document (US EPA, 2002) is on line at: <http://cfpub.epa.gov/oppref/rereg/status.cfm?show=rereg#C>. In addition, Gowan Company the primary registrant, has developed an ancillary analysis of potential effects on salmon and steelhead and provided this for our use in developing our effects determination (Hamer, 2003). We have used and cited information from this analysis. We will be providing it for the Service’s use when Service personnel have been cleared for Confidential Business Information (CBI), but it contains proprietary data on usage developed by another party and can not be made available to persons not cleared for CBI. While we use certain factual data, and refer to it, all conclusions in this current analysis are those of OPP.

Problem Formulation: The purpose of this analysis is to determine whether the registration of methidathion as an insecticide for use on various treatment sites may affect threatened and endangered (T&E or listed) Pacific anadromous salmon and steelhead and their designated critical habitat.

Scope: Although this analysis is specific to listed Pacific anadromous salmon and steelhead and the watersheds in which they occur, it is acknowledged that methidathion is registered for uses that may occur outside this geographic scope and that additional analyses may be required to address other T&E species in the Pacific states as well as across the United States. We understand that any subsequent analyses, requests for consultation and resulting Biological Opinions may necessitate that Biological Opinions relative to this request be revisited, and could be modified.

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- A. 1. Interim Re-Registration Decision (IRED)**
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1. Background

Under section 7 of the Endangered Species Act, the Office of Pesticide Programs (OPP) of the U. S. Environmental Protection Agency (EPA) is required to consult on actions that ‘may affect’ Federally listed endangered or threatened species or that may adversely modify designated critical habitat. Situations where a pesticide may affect a fish, such as any of the salmonid species listed by the National Marine Fisheries Service (NMFS), include either direct or indirect effects on the fish. Direct effects result from exposure to a pesticide at levels that may cause harm.

Acute Toxicity - Relevant acute data are derived from standardized toxicity tests with lethality as the primary endpoint. These tests are conducted with what is generally accepted as the most sensitive life stage of fish, i.e., very young fish from 0.5-5 grams in weight, and with species that are usually among the most sensitive. These tests for pesticide registration include analysis of observable sublethal effects as well. The intent of acute tests is to statistically derive a median effect level; typically the effect is lethality in fish (LC50) or immobility in aquatic invertebrates (EC50). Typically, a standard fish acute test will include concentrations that cause no mortality, and often no observable sublethal effects, as well as concentrations that would cause 100% mortality. By looking at the effects at various test concentrations, a dose-response curve can be derived, and one can statistically predict the effects likely to occur at various pesticide concentrations; a well done test can even be extrapolated, with caution, to concentrations below those tested (or above the test concentrations if the highest concentration did not produce 100% mortality).

OPP typically uses qualitative descriptors to describe different levels of acute toxicity, the most likely kind of effect of modern pesticides (Table 1). These are widely used for comparative purposes, but must be associated with exposure before any conclusions can be drawn with respect to risk. Pesticides that are considered highly toxic or very highly toxic are required to have a label statement indicating that level of toxicity. The FIFRA regulations

[40CFR158.490(a)] do not require calculating a specific LC50 or EC50 for pesticides that are practically non-toxic; the LC50 or EC50 would simply be expressed as >100 ppm. When no lethal or sublethal effects are observed at 100 ppm, OPP considers the pesticide will have “no effect” on the species.

Table 1. Qualitative descriptors for categories of fish and aquatic invertebrate toxicity (from Zucker, 1985)

LC50 or EC50	Category description
< 0.1 ppm	Very highly toxic
0.1- 1 ppm	Highly toxic
>1 < 10 ppm	Moderately toxic
> 10 < 100 ppm	Slightly toxic
> 100 ppm	Practically non-toxic

Comparative toxicology has demonstrated that various species of scaled fish generally have equivalent sensitivity, within an order of magnitude, to other species of scaled fish tested under the same conditions. Sappington et al. (2001), Beyers et al. (1994) and Dwyer et al. (1999), among others, have shown that endangered and threatened fish tested to date are similarly sensitive, on an acute basis, to a variety of pesticides and other chemicals as their non-endangered counterparts.

Chronic Toxicity - OPP evaluates the potential chronic effects of a pesticide on the basis of several types of tests. These tests are often required for registration, but not always. If a pesticide has essentially no acute toxicity at relevant concentrations, or if it degrades very rapidly in water, or if the nature of the use is such that the pesticide will not reach water, then chronic fish tests may not be required [40CFR158.490]. Chronic fish tests primarily evaluate the potential for reproductive effects and effects on the offspring. Other observed sublethal effects are also required to be reported. An abbreviated chronic test, the fish early-life stage test, is usually the first chronic test conducted and will indicate the likelihood of reproductive or chronic effects at relevant concentrations. If such effects are found, then a full fish life-cycle test will be conducted. If the nature of the chemical is such that reproductive effects are expected, the abbreviated test may be skipped in favor of the full life-cycle test. These chronic tests are designed to determine a “no observable effect level” (NOEL) and a “lowest observable effect level” (LOEL). A chronic risk requires not only chronic toxicity, but also chronic exposure, which can result from a chemical being persistent and resident in an environment (e.g., a pond) for a chronic period of time or from repeated applications that transport into any environment such that exposure would be considered “chronic”.

As with comparative toxicology efforts relative to sensitivity for acute effects, EPA, in

conjunction with the U. S. Geological Survey, has a current effort to assess the comparative toxicology for chronic effects also. Preliminary information indicates, as with the acute data, that endangered and threatened fish are again of similar sensitivity to similar non-endangered species.

Metabolites and Degradates - Information must be reported to OPP regarding any pesticide metabolites or degradates that may pose a toxicological risk or that may persist in the environment [40CFR159.179]. Toxicity and/or persistence test data on such compounds may be required if, during the risk assessment, the nature of the metabolite or degradate and the amount that may occur in the environment raises a concern. If actual data or structure-activity analyses are not available, the requirement for testing is based upon best professional judgement.

Inert Ingredients - OPP does take into account the potential effects of what used to be termed “inert” ingredients, but which are beginning to be referred to as “other ingredients”. OPP has classified these ingredients into several categories. A few of these, such as nonylphenol, can no longer be used without including them on the label with a specific statement indicating the potential toxicity. Based upon our internal databases, we can find no product in which nonylphenol is now an ingredient. Many others, including such ingredients as clay, soybean oil, many polymers, and chlorophyll, have been evaluated through structure-activity analysis or data and determined to be of minimal or no toxicity. There exist also two additional lists, one for inerts with potential toxicity which are considered a testing priority, and one for inerts unlikely to be toxic, but which cannot yet be said to have negligible toxicity. Any new inert ingredients are required to undergo testing unless it can be demonstrated that testing is unnecessary.

The inerts efforts in OPP are oriented only towards toxicity at the present time, rather than risk. It should be noted, however, that very many of the inerts are in exceedingly small amounts in pesticide products. While some surfactants, solvents, and other ingredients may be present in fairly large amounts in various products, many are present only to a minor extent. These include such things as coloring agents, fragrances, and even the printers ink on water soluble bags of pesticides. Some of these could have moderate toxicity, yet still be of no consequence because of the negligible amounts present in a product. If a product contains inert ingredients in sufficient quantity to be of concern, relative to the toxicity of the active ingredient, OPP attempts to evaluate the potential effects of these inerts through data or structure-activity analysis, where necessary.

For a number of major pesticide products, testing has been conducted on the formulated end-use products that are used by the applicator. The results of fish toxicity tests with formulated products can be compared with the results of tests on the same species with the active ingredient only. A comparison of the results should indicate comparable sensitivity, relative to the percentage of active ingredient in the technical versus formulated product, if there is no extra activity due to the combination of inert ingredients. We note that the “comparable” sensitivity must take into account the natural variation in toxicity tests, which is up to 2-fold for the same species in the same laboratory under the same conditions, and which can be somewhat higher between different laboratories, especially when different stocks of test fish are used.

The comparison of formulated product and technical ingredient test results may not provide specific information on the individual inert ingredients, but rather is like a “black box” which sums up the effects of all ingredients. We consider this approach to be more appropriate than testing each individual inert and active ingredient because it incorporates any additivity, antagonism, and synergism effects that may occur and which might not be correctly evaluated from tests on the individual ingredients. We do note, however, that we do not have aquatic data on most formulated products, although we often have testing on one or perhaps two formulations of an active ingredient.

Risk - An analysis of toxicity, whether acute or chronic, lethal or sublethal, must be combined with an analysis of how much will be in the water, to determine risks to fish. Risk is a combination of exposure and toxicity. Even a very highly toxic chemical will not pose a risk if there is no exposure, or very minimal exposure relative to the toxicity. OPP uses a variety of chemical fate and transport data to develop “estimated environmental concentrations” (EECs) from a suite of established models. The development of aquatic EECs is a tiered process.

The first tier screening model for EECs is with the GENEEC program, developed within OPP, which uses a generic site (in Yazoo, MS) to stand for any site in the U. S. The site choice was intended to yield a maximum exposure, or “worst-case,” scenario applicable nationwide, particularly with respect to runoff. The model is based on a 10 hectare watershed that surrounds a one hectare pond, two meters deep. It is assumed that all of the 10 hectare area is treated with the pesticide and that any runoff would drain into the pond. The model also incorporates spray drift, the amount of which is dependent primarily upon the droplet size of the spray. OPP assumes that if this model indicates no concerns when compared with the appropriate toxicity data, then further analysis is not necessary as there would be no effect on the species.

It should be noted that prior to the development of the GENEEC model in 1995, a much more crude approach was used to determining EECs. Older reviews and Reregistration Eligibility Decisions (REDs) may use this approach, but it was excessively conservative and does not provide a sound basis for modern risk assessments. For the purposes of endangered species consultations, we will attempt to revise this old approach with the GENEEC model, where the old screening level raised risk concerns.

When there is a concern with the comparison of toxicity with the EECs identified in GENEEC model, a more sophisticated PRZM-EXAMS model is run to refine the EECs if a suitable scenario has been developed and validated. The PRZM-EXAMS model was developed with widespread collaboration and review by chemical fate and transport experts, soil scientists, and agronomists throughout academia, government, and industry, where it is in common use. As with the GENEEC model, the basic model remains as a 10 hectare field surrounding and draining into a 1 hectare pond. Crop scenarios have been developed by OPP for specific sites, and the model uses site-specific data on soils, climate (especially precipitation), and the crop or site. Typically, site-scenarios are developed to provide for a worst-case analysis for a particular crop in a particular geographic region. The development of site scenarios is very time consuming; scenarios have not yet been developed for a number of crops and locations. OPP

attempts to match the crop(s) under consideration with the most appropriate scenario. For some of the older OPP analyses, a very limited number of scenarios were available.

One area of significant weakness in modeling EECs relates to residential uses, especially by homeowners, but also to an extent by commercial applicators. There are no usage data in OPP that relate to pesticide use by homeowners on a geographic scale that would be appropriate for an assessment of risks to listed species. For example, we may know the maximum application rate for a lawn pesticide, but we do not know the size of the lawns, the proportion of the area in lawns, or the percentage of lawns that may be treated in a given geographic area. There is limited information on soil types, slopes, watering practices, and other aspects that relate to transport and fate of pesticides. We do know that some homeowners will attempt to control pests with chemicals and that others will not control pests at all or will use non-chemical methods. We would expect that in some areas, few homeowners will use pesticides, but in other areas, a high percentage could. As a result, OPP has insufficient information to develop a scenario or address the extent of pesticide use in a residential area. It is also important to note that pesticides used in urban areas can be expected to transport considerable distances if they should run off on to concrete or asphalt, such as with streets (e.g., TDK Environmental, 1991). This makes any quantitative analysis very difficult to address aquatic exposure from home use. It also indicates that a no-use or no-spray buffer approach for protection, which we consider quite viable for agricultural areas, may not be particularly useful for urban areas.

Finally, the applicability of the overall EEC scenario, i.e., the 10 hectare watershed draining into a one hectare farm pond, may not be appropriate for a number of T&E species living in rivers or lakes. This scenario is intended to provide a “worst-case” assessment of EECs, but very many T&E fish do not live in ponds, and very many T&E fish do not have all of the habitat surrounding their environment treated with a pesticide. OPP does believe that the EECs from the farm pond model do represent first order streams, such as those in headwaters areas (Effland, et al. 1999). In many agricultural areas, those first order streams may be upstream from pesticide use, but in other areas, or for some non-agricultural uses such as forestry, the first order streams may receive pesticide runoff and drift. However, larger streams and lakes will very likely have lower, often considerably lower, concentrations of pesticides due to more dilution by the receiving waters. In addition, where persistence is a factor, streams will tend to carry pesticides away from where they enter into the streams, and the models do not allow for this. The variables in size of streams, rivers, and lakes, along with flow rates in the lotic waters and seasonal variation, are large enough to preclude the development of applicable models to represent the diversity of T&E species’ habitats. We can simply qualitatively note that the farm pond model is expected to overestimate EECs in larger bodies of water.

Indirect Effects - We also attempt to protect listed species from indirect effects of pesticides. We note that there is often not a clear distinction between indirect effects on a listed species and adverse modification of critical habitat (discussed below). By considering indirect effects first, we can provide appropriate protection to listed species even where critical habitat has not been designated. In the case of fish, the indirect concerns are routinely assessed for food and cover.

The primary indirect effect of concern would be for the food source for listed fish. These are best represented by potential effects on aquatic invertebrates, although aquatic plants or plankton may be relevant food sources for some fish species. However, it is not necessary to protect individual organisms that serve as food for listed fish. Thus, our goal is to ensure that pesticides will not impair populations of these aquatic arthropods. In some cases, listed fish may feed on other fish. Because our criteria for protecting the listed fish species is based upon the most sensitive species of fish tested, then by protecting the listed fish species, we are also protecting the species used as prey.

In general, but with some exceptions, pesticides applied in terrestrial environments will not affect the plant material in the water that provides aquatic cover for listed fish. Application rates for herbicides are intended to be efficacious, but are not intended to be excessive. Because only a portion of the effective application rate of an herbicide applied to land will reach water through runoff or drift, the amount is very likely to be below effect levels for aquatic plants. Some of the applied herbicides will degrade through photolysis, hydrolysis, or other processes. In addition, terrestrial herbicide applications are efficacious in part, due to the fact that the product will tend to stay in contact with the foliage or the roots and/or germinating plant parts, when soil applied. With aquatic exposures resulting from terrestrial applications, the pesticide is not placed in immediate contact with the aquatic plant, but rather reaches the plant indirectly after entering the water and being diluted. Aquatic exposure is likely to be transient in flowing waters. However, because of the exceptions where terrestrially applied herbicides could have effects on aquatic plants, OPP does evaluate the sensitivity of aquatic macrophytes to these herbicides to determine if populations of aquatic macrophytes that would serve as cover for T&E fish would be affected.

For most pesticides applied to terrestrial environment, the effects in water, even lentic water, will be relatively transient. Therefore, it is only with very persistent pesticides that any effects would be expected to last into the year following their application. As a result, and excepting those very persistent pesticides, we would not expect that pesticidal modification of the food and cover aspects of critical habitat would be adverse beyond the year of application. Therefore, if a listed salmon or steelhead is not present during the year of application, there would be no concern. If the listed fish is present during the year of application, the effects on food and cover are considered as indirect effects on the fish, rather than as adverse modification of critical habitat.

Designated Critical Habitat - OPP is also required to consult if a pesticide may adversely modify designated critical habitat. In addition to the indirect effects on the fish, we consider that the use of pesticides on land could have such an effect on the critical habitat of aquatic species in a few circumstances. For example, use of herbicides in riparian areas could affect riparian vegetation, especially woody riparian vegetation, which possibly could be an indirect effect on a listed fish. However, there are very few pesticides that are registered for use on riparian vegetation, and the specific uses that may be of concern have to be analyzed on a pesticide by pesticide basis. In considering the general effects that could occur and that could be a problem for listed salmonids, the primary concern would be for the destruction of vegetation near the

stream, particularly vegetation that provides cover or temperature control, or that contributes woody debris to the aquatic environment. Destruction of low growing herbaceous material would be a concern if that destruction resulted in excessive sediment loads getting into the stream, but such increased sediment loads are insignificant from cultivated fields relative to those resulting from the initial cultivation itself. Increased sediment loads from destruction of vegetation could be a concern in uncultivated areas. Any increased pesticide load as a result of destruction of terrestrial herbaceous vegetation would be considered a direct effect and would be addressed through the modeling of estimated environmental concentrations. Such modeling can and does take into account the presence and nature of riparian vegetation on pesticide transport to a body of water.

Risk Assessment Processes - All of our risk assessment procedures, toxicity test methods, and EEC models have been peer-reviewed by OPP's Science Advisory Panel. The data from toxicity tests and environmental fate and transport studies undergo a stringent review and validation process in accordance with "Standard Evaluation Procedures" published for each type of test. In addition, all test data on toxicity or environmental fate and transport are conducted in accordance with Good Laboratory Practice (GLP) regulations (40 CFR Part 160) at least since the GLPs were promulgated in 1989.

The risk assessment process is described in "Hazard Evaluation Division - Standard Evaluation Procedure - Ecological Risk Assessment" by Urban and Cook (1986) (termed Ecological Risk Assessment SEP below), which has been separately provided to National Marine Fisheries Service staff. Although certain aspects and procedures have been updated throughout the years, the basic process and criteria still apply. In a very brief summary: the toxicity information for various taxonomic groups of species is quantitatively compared with the potential exposure information from the different uses and application rates and methods. A risk quotient of toxicity divided by exposure is developed and compared with criteria of concern. The criteria of concern presented by Urban and Cook (1986) are presented in Table 2.

Table 2. Risk-quotient criteria for fish and aquatic invertebrates

Test data	Risk quotient	Presumption
Acute LC50	>0.5	Potentially high acute risk
Acute LC50	>0.1	Risk that may be mitigated through restricted use classification
Acute LC50	>0.05	Endangered species may be affected acutely, including sublethal effects

Test data	Risk quotient	Presumption
Chronic NOEC	>1	Chronic risk; endangered species may be affected chronically, including reproduction and effects on progeny
Acute invertebrate LC50	>0.5	May be indirect effects on T&E fish through food supply reduction
Aquatic plant acute EC50	>0.5	May be indirect effects on aquatic vegetative cover for T&E fish

The Ecological Risk Assessment SEP (pages 2-6) discusses the quantitative estimates of how the acute toxicity data, in combination with the slope of the dose-response curve, can be used to predict the percentage mortality that would occur at the various risk quotients. The discussion indicates that using a “safety factor” of 10, as applies for restricted use classification, one individual in 30,000,000 exposed to the concentration would be likely to die. Using a “safety factor” of 20, as applies to aquatic T&E species, would exponentially increase the margin of safety. It has been calculated by one pesticide registrant (without sufficient information for OPP to validate that number), that the probability of mortality occurring when the LC50 is 1/20th of the EEC is 2.39×10^{-9} , or less than one individual in ten billion. It should be noted that the discussion (originally part of the 1975 regulations for FIFRA) is based upon slopes of primarily organochlorine pesticides, stated to be 4.5 probits per log cycle at that time. As organochlorine pesticides were phased out, OPP undertook an analysis of more current pesticides based on data reported by Johnson and Finley (1980), and determined that the “typical” slope for aquatic toxicity tests for the “more current” pesticides was 9.95. Because the slopes are based upon logarithmically transformed data, the probability of mortality for a pesticide with a 9.95 slope is again exponentially less than for the originally analyzed slope of 4.5.

The above discussion focuses on mortality from acute toxicity. OPP is concerned about other direct effects as well. For chronic and reproductive effects, our criteria ensures that the EEC is below the no-observed-effect-level, where the “effects” include any observable sublethal effects. Because our EEC values are based upon “worst-case” chemical fate and transport data and a small farm pond scenario, it is rare that a non-target organism would be exposed to such concentrations over a period of time, especially for fish that live in lakes or in streams (best professional judgement). Thus, there is no additional safety factor used for the no-observed-effect-concentration, in contrast to the acute data where a safety factor is warranted because the endpoints are a median probability rather than no effect.

Sublethal Effects - With respect to sublethal effects, Tucker and Leitzke (1979) did an extensive review of existing ecotoxicological data on pesticides. Among their findings was that sublethal effects as reported in the literature did not occur at concentrations below one-fourth to

one-sixth of the lethal concentrations, when taking into account the same percentages or numbers affected, test system, duration, species, and other factors. This was termed the “6x hypothesis”. Their review included cholinesterase inhibition, but was largely oriented towards externally observable parameters such as growth, food consumption, behavioral signs of intoxication, avoidance and repellency, and similar parameters. Even reproductive parameters fit into the hypothesis when the duration of the test was considered. This hypothesis supported the use of lethality tests for use in assessing ecotoxicological risk, and the lethality tests are well enough established and understood to provide strong statistical confidence, which can not always be achieved with sublethal effects. By providing an appropriate safety factor, the concentrations found in lethality tests can therefore generally be used to protect from sublethal effects.

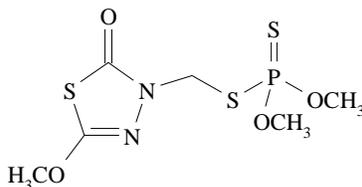
In recent years, Moore and Waring (1996) challenged Atlantic salmon with diazinon and observed effects on olfaction as relates to reproductive physiology and behavior. Their work indicated that diazinon could have sublethal effects of concern for salmon reproduction. However, the nature of their test system, direct exposure of olfactory rosettes, could not be quantitatively related to exposures in the natural environment. Subsequently, Scholz et al. (2000) conducted a non-reproductive behavioral study using whole Chinook salmon in a model stream system that mimicked a natural exposure that is far more relevant to ecological risk assessment than the system used by Moore and Waring (1996). The Scholz et al. (2000) data indicate potential effects of diazinon on Chinook salmon behavior at very low levels, with statistically significant effects at nominal diazinon exposures of 1 ppb, with apparent, but non-significant effects at 0.1 ppb.

It would appear that the Scholz et al (2000) work contradicts the 6x hypothesis. The research design, especially the nature and duration of exposure, of the test system used by Scholz et al (2000), along with a lack of dose-response, precludes comparisons with lethal levels in accordance with 6x hypothesis as used by Tucker and Leitzke (1979). Nevertheless, it is known that olfaction is an exquisitely sensitive sense. And this sense may be particularly well developed in salmon, as would be consistent with its use by salmon in homing (Hasler and Scholz, 1983). So the contradiction of the 6x hypothesis is not surprising. As a result of these findings, the 6x hypothesis needs to be re-evaluated with respect to olfaction. At the same time, because of the sensitivity of olfaction and because the 6x hypothesis has generally stood the test of time otherwise, it would be premature to abandon the hypothesis for other sublethal effects until there are additional data.

2. Description and use of Methidathion

a. Chemical Overview

Methidathion:



- **Common name:** Methidathion
- □ **Chemical name:** O,O-dimethylphosphorodithioate, S-ester with 4-(mercaptomethyl-2-methoxy-1,3,4-thiadiazolin-5-one)
- **Chemical family:** Organophosphate
- **Case number:** 0034
- □ **CAS registry number:** 950-37-8
- □ **OPP chemical code:** 100301
- □ **Empirical formula:** C₆H₁₁N₂O₄PS₃
- □ **Molecular weight:** 302.3 g/mole
- □ **Trade and other names:** Supracide[®]
- □ **Basic manufacturer:** Gowan Company and Novartis, Inc.

Target Pests: Peach twig borer, scale insects, artichoke plume moth, leafminers, spider mites, boll weevils, bollworms, lygus bug, whitefly, aphid, pear psylla, mealybugs, thrips, sunflower stern weevil, sunflower moth, sunflower seed weevil, sunflower midge, Banks grass mite, flea beetle, hornworm, tobacco budworm, codling moth, and hickory shuckworm

Formulation Types Registered: Wettable powder in water-soluble bags (25% active ingredient) and emulsifiable concentrate (22 - 24% active ingredient)

Methidathion is a colorless to white crystalline solid with an organophosphate odor and a melting point of 39° - 40° C. Methidathion is slightly soluble in water at 240 ppm (20° C) and is soluble in benzene, acetone, methanol, and xylene at more than 60 g/100 mL (25° C). Methidathion is only moderately soluble in chloroform and dichloromethane. The vapor pressure of methidathion is 2.5 X 10⁻⁴ Pa at 20° C.

b. Registered uses

Methidathion is a non-systemic organophosphate insecticide/acaricide registered for use to control a wide range of sucking, leaf-eating, and scale insects. It acts by inhibiting certain enzymes in the invertebrate system. Methidathion is used on a variety of food and feed crops that include alfalfa (grown for seed), almonds, apples, apricots, artichokes, carambola, cherries, clover (grown for seed), cotton, grapefruit, hay-grass, kiwi fruit, lemons, longan, mandarins, mangos, nectarines, olives, oranges, peaches, pears, pecans, plums, prunes, safflower, sorghum, sugar apple, sunflower, timothy, and walnuts. Methidathion is also used on terrestrial non-food crops such as tobacco and nursery stock. (Special Local Need-24(c) uses)

The end-use products of methidathion include two wettable powders (WP) at 25% ai in water soluble bags, and two liquid emulsifiable concentrates (EC) at 22.6% and 24.4% ai. The two EC product registrations are owned and maintained by Gowan Co. While these products are

not produced or marketed at this time, EPA must consider these formulations as part of the total potential risk from exposure to methidathion. Based on 1987 through 1997 usage information, an estimate of methidathion's total domestic annual usage averaged approximately 241,000 pounds active ingredient (ai) for 138,000 acres treated. Its largest markets in terms of total pounds ai are almonds (18%), oranges (17%), plums and prunes (15%), and walnuts (13%). Crops with a high percentage of their total U.S. planted acres treated with methidathion include artichokes (50%), plums and prunes (11%) and walnuts (9%).

Methidathion was first registered in the United States in 1972 to control a broad spectrum of agricultural insect and mite pests on various crops. A Registration Standard was issued in 1983. In 1988, an interim reregistration eligibility decision was issued based on data submitted since 1983.

Method and Rates of Application:

Equipment: Fixed wing aircraft, groundboom, airblast, low-pressure handwand or backpack sprayer

Method and Rate: 0.25 to 5.0 lb ai/acre, foliar treatment

Timing: During dormant, delayed-dormant, or postbloom phases, depending on the crop

Use Classification: Restricted Use Pesticide

c. Application rates and methods

Methidathion is applied by aerial equipment, ground boom equipment, and with low pressure handwands or back pack sprayers. The maximum label applications rates vary from 0.25 to 5.0 lbs active ingredient ai/ acre for foliar treatment. Methidathion is a “restricted use” chemical due to toxicity to humans, avian species, and honey bees.

The registered crops and the maximum and typical application rates. Table 3 shows the typical rates, on average, are half the maximum rate.

Table 3. National Usage Summary for Methidathion Usage (EFED)

Crop	Maximum Application Rate		Typical Application Rate	
	Lb ai/A per app.	# of Applications	Lb ai/A per app.	# of Applications
Almonds	3	1	1.5	1
Artichokes	1	8	1	2
Citrus	5	2	2	1

Cotton	1	16 ¹	0.5	2
Olives	3	1	1.5	1
Pome Fruits	3	1	1.5	1
Stone Fruits	3	1	1.5	1
Safflower	0.5	3	0.5	1
Pecans	4	2	1.5	1
Walnuts	3	3	1.5	1

¹ Not to exceed 4lbs ai/A during any one growing season

d. Methidathion usage

This section summarizes the best estimates available for many of the pesticide uses of methidathion, based on available pesticide usage information for 1987 - 1997. A full listing of all uses of methidathion, with the corresponding use and usage data for each site, has been completed and is in the "Quantitative Use Analysis" document, which is attached to this document (attachment G). The data, reported on an aggregate and site (crop) basis, reflect annual fluctuations in use patterns as well as the variability in using data from various information sources. Approximately 241,000 pounds for 138,000 acres of methidathion is used annually, according to Agency and registrant estimates.

Methidathion is used primarily in California (90-95%), with the remainder of the use in Florida, Arizona, Washington, New York, and Virginia. Special Local Needs registrations are listed for timothy hay (non-feed) in Washington, alfalfa (non-feed) in California, and for certain fruit crops (kiwi fruit, longan, carambola, mango, and sugar apple). Based on 1987 through 1997 usage information, an estimate of methidathion's total domestic annual usage averaged approximately 241,000 pounds active ingredient (ai) for 138,000 acres treated. Its largest markets in terms of total pounds ai are almonds (18%), oranges (17%), plums and prunes (15%), and walnuts (13%). Crops with a high percentage of their total U.S. planted acres treated with methidathion include artichokes (50%), plums and prunes (11%) and walnuts (9%).

A further refinement of methidathion's potential for ecological risk is possible due to its predominant use in California. According to BEAD's usage information from 1991 through 1994 and an EFED communication with Chris Foe (California Central Valley Regional Water Quality Control Board) the majority of methidathion is used on citrus as a foliar spray; followed by all other orchard crops as a non foliar dormant spray from mid November through February and lastly cotton as an early season foliar spray. As was noted in table 3, methidathion is either registered for a single application or is typically applied only once (perhaps twice) per season even for citrus, walnuts and cotton.

Table 4 shows the average weight of Methidathion active ingredient applied to the listed crops,

the maximum percent of this crop actually treated and the resulting percent of crop treated by average weight. The majority of the active ingredient in average weight was used in almonds, oranges, plums and prunes, and walnuts. However, the highest percent of the crop treated was artichokes (63% max likely).

Table 4. Methidathion Estimated Usage¹ for Representative Sites² (IREC)

Crop	Lbs. Active Ingredient Applied (Wt. Avg.) ³	Percent Crop Treated (Likely Maximum)	Percent Crop Treated (Wt. Avg.)
Alfalfa (grown for seed)	1,000	<0.5	<0.5
Almonds	44,000	9	6
Apples	8,000	3	1
Apricot	2,000	8	5
Artichokes	16,000	63	50
Cherries	2,000	3	1
Cotton	16,000	<0.5	<0.5
Grapefruit	1,000	1	1
Hay	1,000	<0.5	<0.5
Kiwifruit	<500	8	7
Lemon	1,000	2	1
Nectarine	4,000	11	5
Olive	2,000	5	2
Oranges	42,000	3	2
Peaches	25,000	11	6
Pears	2,000	5	1
Pecans	2,000	<0.5	<0.5
Plums and Prunes	35,000	21	11
Safflower	1,000	9	1
Walnuts	31,000	11	9

¹Usage data primarily covers 1987 to 1997. Calculations of the above numbers are displayed as rounded.

²Where usage and percent-crop-treated data is not listed (carambola, clover [grown for seed], longan and mango), either no usage is observed or that information on the site is not available or insufficient.

³Weighted Average based on data for 11 years; most recent and more reliable data weighted more heavily.

Sources:

EPA data (Doane Marketing Research, Maritz Marketing Research, Mike Buckley and Associates).
 California Department of Pesticide Regulation.
 USDA, National Agricultural Statistics Service, Agricultural Chemical Usage: Fruits Summary (1991, 1993, 1995, 1997), and Field Crop Summary (1990-1997).

The latest information for California pesticide use is for the year 2001 [URL: <http://www.cdpr.ca.gov/docs/pur/purmain.htm>]. The reported information to the County Agricultural Commissioners includes pounds used, acres treated for agricultural and certain other uses, and the specific location treated. The pounds and acres are reported to the state, but the specific location information is retained at the county level and is not readily available.

Table 5. Reported use of Methidathion in California, 1993-2002 (lb ai)

1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
451,890	367,852	321,709	328,836	309,347	178,455	177,105	98,129	93,521	67,455

The total number of pounds of active ingredient decreased by an average 6 fold between 1993 and 2002.

Table 6. Use of Methidathion by crop or site in California in 2002

Crop	Pounds of Active Ingredient Used	Number of Applications	Acres Treated
Alfalfa	286.84	6	317
Almond	10,973.59	126	8,496.77
Apple	4,336.09	85	3,075.16
Apricot	636.32	26	311.5
Artichoke, globe	11,920.26	335	12,113.9
Cherry	3,154.6712	78	2,013.3
Citrus	307.05	8	116
Forage Hay/ Silage	541.22	13	691.7
Grapefruit	377.45	14	107.6
Kiwi	125.13	14	152.5
Lemon	278.62	5	89.5
Greenhouse plants in containers	0.0602	1	0.10
Outdoor plants in containers	223.41	25	513.9
Outdoor transplants	152.20	4	149.5
Nectarine	3,117.4	96	2,156

Olive	3023	35	1518
Orange	1,4243.4	213	5,293.34
Peach	5604.72	184	4190.34
Pear	500.14	18	303.24
Plum	1,635.28	76	940.75
Prune	2,072.60	32	1541.5
Research Commodity	47.5	N.R.	N.R.
Safflower	613.38	16	2239.5
Tangelo	73.125	2	26
Tangerine	760.69	13	444.75
Walnut	2,879.1280	72	1,752.26
Total	67,883.34		37,644

¹Treating 75 acres with less than one pound seems incorrect, but this is what DPR reported.

² Methidathion use for the second number was not reported in the number of acres treated

³ California database only reports total number of pounds used. This number should be divided by the application rate to calculate the actual amount used/ application.

The largest amount of pounds used in California was on artichokes and almonds. There were 126 and 335 applications of methidathion on almonds and artichokes respectively, totaling over 20,000 acres treated with approximately 22,000 pounds of methidathion. As seen in table 6 the total amount of active ingredient used in California in 2002 was 67,883 pounds on 37,644 acres (~2lbs/ acre).

The Washington State Department of Agriculture (WSDA) has provided information on the acreage of major Methidathion treated crops and additional details on amounts used for certain of these crops (WSDA, 2003). These are in table 7 ; additional information is in the full report, which is included as Attachment B.

Table 7. Major usage of Methidathion in Washington (WSDA, 2004)

crop	acres planted ¹	acres treated (% treated)	lbs ai/A	# apps	est. acres treated	est lbs ai applied
Apple	164,000	5	2	1	8,200	16,400
Apricot	1,300					
Artichoke. globe	<50					
Cherry	25,00	10	2	1	2,500	5,000
Peaches & nectarines	4,300	50	2	1	2,150	4,300

Plums & prunes	1,000	1	2	1	10	20
Pears	24,800	1	2	1	250	500
Timothy	35,000	5	0.75	1	1,750	1,300

There are limited data available on the amount of methidathion used in Oregon and for “less than major” crops in Washington.

3. General Aquatic Risk Assessment for Endangered and Threatened Pacific Salmon and Steelhead

a. Aquatic toxicity

i. Freshwater Fish, Acute

Two freshwater fish toxicity studies using the technical grade of the active ingredient are required to establish the toxicity of a pesticide to fish. The preferred test species are rainbow trout (a coldwater fish) and bluegill sunfish (a warmwater fish). Results of these tests are tabulated below.

Table 8. Acute toxicity of Methidathion to Freshwater Fish (IREED chapter)

Species	Scientific name	% a.i.	LC50 (ppb ai)	Toxicity Category
Technical material				
Rainbow trout	<i>Oncorhynchus mykiss</i>	98.5	14	very highly toxic
Rainbow trout	<i>Oncorhynchus mykiss</i>	97.7	10	very highly toxic
Bluegill sunfish	<i>Lepomis maceochirus</i>	98.5	9	very highly toxic
Bluegill sunfish	<i>Lepomis maceochirus</i>	95	2.2	very highly toxic
Formulated product				
Rainbow trout	<i>Oncorhynchus mykiss</i>	2E (25.2%)	26.2 ppb product 6.6 ppb ai	very highly toxic
Bluegill sunfish	<i>Lepomis maceochirus</i>	25.2	32.5 ppb product 8.2 ppb ai	very highly toxic

Both technical and formulated products of methidathion were found to be very highly toxic to freshwater fish.

The Ecotox database is a combination of toxicity testing for various pesticides. It can be accessed through EPA’s website: www.epa.gov/ecotox. Below are additional species toxicity data on freshwater fish from the Ecotox database.

Table 9. Acute Toxicity of Methidathion to Freshwater Fish (Ecotox)

Species	Scientific name	% a.i.	96 hr LC50
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Sheepshead minnow	<i>Cyprinodon variegatus</i>	25.2	95 (84-107)
Sheepshead minnow	<i>Cyprinodon variegatus</i>	97.2	7.8 (6.9-11.0)
Sheepshead minnow	<i>Cyprinodon variegatus</i>	25.2	111.9

ii. Freshwater Invertebrates, Acute

In the IRED assessment of methidathion toxicity to invertebrates both the technical and formulated product were found to be very highly toxic.

Table 10. Acute Toxicity of Methidathion to Freshwater Invertebrates (IRED)

Species	Scientific name	% a.i.	LC50/ EC50 (ppb ai)	Toxicity Category
Water flea	<i>Daphnia magna</i>	25.5 (2E)	11.9 ppb product/ 3.0 ppb ai	very highly toxic
Water flea	<i>Daphnia magna</i>	tech	6.4	very highly toxic

iii. Freshwater Fish, Chronic

Chronic studies demonstrate the no observable effects concentration (NOEC) and the lowest observable effects concentrations (LOEC) of methidathion on freshwater fish and invertebrates.

Table 11. Chronic toxicity of Methidathion to Freshwater Fish (IRED)

Species	Scientific name	% a.i.	NOEC/ LOEC (ppb)	Endpoints Affected
Fathead minnow	<i>Pimphales promelas</i>	99.2	6.1/12.0	Post-hatch survival; growth

iv. Freshwater Invertebrates, Chronic

Table 12. Chronic Toxicity of Methidathion to Freshwater Invertebrates (IRED)

Species/ (flow-through)	Scientific name	% a.i.	21-day NOEC/ LOEC (ppb)	Endpoints Affected
Water flea	<i>Daphnia magna</i>	96.1	0.66/1.13	survival; # young/ female/ repro.day

Table 13. Freshwater Invertebrates Life-Cycle Toxicity (Ecotox)

Species	Scientific name	21-day NOEC/ LOEC ppb	Endpoint Affected
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Water flea	Daphnia magna	0.5/ 1.0	survival
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v. Estuarine and Marine Animals

Below are the chronic, acute, and life stage toxicity to estuarine and marine fauna from the Ecotox database

Table 14. Acute and Chronic Toxicity of Methidathion to Estuarine and Marine Invertebrates (Ecotox)

Species	Scientific name	% a.i.	96 hr LC50 ppb
Mysid	Mysidopsis bahia	97.2	0.7 (0.44-0.99)
Mysid	Mysidopsis bahia	25.2	2.34

Table 15. Estuarine and Marine Invertebrates Life-Cycle Toxicity (Ecotox)

Species	Scientific name	21-day NOEC/ LOEC ppb	Endpoint
Mysid	Mysidopsis bahia	0.02/0.06	survival/ growth

vi. Sub-lethal and Endocrine Effects

Sublethal and endocrine affects are addressed in the IRED:

“The Agency is required under the FFDCA, as amended by FQPA, to develop a screening program to determine whether certain substances (including all pesticide active and other ingredients) “may have an effect in humans that is similar to an effect produced by a naturally occurring estrogen, or other such endocrine effects as the Administrator may designate.” Following the recommendations of its Endocrine Disruptor Screening and Testing Advisory Committee (EDSTAC), EPA determined that there were scientific bases for including as part of the program, the androgen and thyroid hormone systems, in addition to the estrogen hormone system. EPA also adopted EDSTAC’s recommendation that the Program include evaluations of potential effects in wildlife. For pesticide chemicals, EPA will use FIFRA and, to the extent that effects in wildlife may help determine whether a substance may have an effect in humans, FFDCA authority to require the wildlife evaluations. As the science develops and resources allow, screening of additional hormone systems may be added to the Endocrine Disruptor Screening Program (EDSP).

When the appropriate screening and/or testing protocols being considered under the Agency’s EDSP have been developed, methidathion may be subjected to additional screening and/or testing

to better characterize effects related to endocrine disruption.”

b. Environmental fate and transport

Based on estimated environmental concentrations (EECs) from modeling and toxicity data for aquatic organisms, the Agency’s levels of concern are exceeded for acute and chronic effects to endangered fish and non-target invertebrates.

In California the majority of methidathion is used as a dormant spray, therefore aquatic organisms are likely to be exposed through runoff during the winter rainy season. During the remainder of the year, surface water contamination would be primarily through drift.

According to the IRED, none of the known degradates of methidathion are of toxicological concern. Therefore, these degradates are not included in this assessment.

c. Incidents

As discussed in the IRED on page 32, methidathion has a high acute toxicity to all classes of animals. However, the Agency has received documented field kills mostly for birds. California monitors the impact of dormant sprays on raptors wintering in the central valley. The Agency received 5 reports from the California Department of Fish and Game. Four red-tailed hawks (*Buteo jamaicensis*) and one northern harrier (*Circus cyaneus*), sent to the Pesticide Investigation Unit from January 1994 through December 1997 contained residues of methidathion. Four of the five birds were found in or adjacent to orchards.

As of February 2004 there were only 2 aquatic incidents documented; one from 1976 and another from 2002. In the incident in 1976 methidathion was rated as a highly probable cause of the fish kill. The incident was a result of runoff following an aerial application of Methidathion to an agricultural area in Sacramento county California. The incident from 2002 was rated unlikely to be caused by methidathion.

d. Estimated and measured concentrations of Methidathion in water

EECs from models

In the IRED chapter, methidathion aquatic EECs were estimated using two models, depending upon the site. All of the sites were based on climate and soils relative to the southeastern U.S., and are not likely to be representative of the western U. S. Consequently, additional efforts were made to use more recently developed sites to be more representative of the areas where Pacific salmon and steelhead occur. In the table below are western PRZMS-EXAMS results for the fruits, almonds and alfalfa.

The models consider that a 10-hectare watershed will all be treated with the maximum rate, maximum numbers of applications, and minimum intervals between applications. Runoff and drift from this 10-hectare watershed will go into a 1-hectare pond, 2 meters deep. This is a conservative model for salmon and steelhead. While first order streams may be reasonably predicted for a single application, salmon and steelhead, except sockeye, occur primarily in streams and rivers where natural flow of water, and any contaminants in the water column, will move downstream and preclude continued exposure from a single application. Multiple applications may provide for chronic exposure, most likely in a pulsed mode.

The EEC values of various, mostly western, crops and rates at various durations using aerial or ground applications are presented in the tables below. Further calculations and descriptions can be seen in Attachment C.

Table 16. Exposure Summary for Aerial Applications

Modeled EECs resulting from a single <u>aerial</u> application of methidathion at the maximum label rate for each crop					
Use	Peak (ppb)	96-hr average	21-d average	60-d average	90-d average
CA-Fruits	15.50	14.75	12.27	9.00	7.22
CA-Almonds	14.60	13.85	12.00	8.36	6.46
OR-Alfalfa	9.77	9.40	8.46	6.08	4.90

For comparison, PRZM-EXAMS was also run for ground application only. In these cases, application efficiency was 0.99, and spray drift was 0.01.

Table 17. Exposure Summary for ground Applications

Modeled EECs resulting from a single <u>ground</u> application of methidathion at the maximum label rate for each crop					
Use	Peak (ppb)	96-hr average	21-d average	60-d average	90-d average
CA-Fruits	10.57	10.12	8.92	6.05	4.72
CA-Almonds	9.85	9.35	7.77	5.25	4.04
OR-Alfalfa	8.56	8.21	7.34	5.26	4.19

Measured residues in the environment

NAWQA data

Monitoring data for methidathion is available from the NAWQA program as obtained from “USGS data warehouse”

(http://infotrek.er.usgs.gov/servlet/page?_pageid=543&_dad=portal30&_schema=PORTAL30).

Table 18 presents a summary of these monitoring data for the U. S. as a whole, and in study sites in states within the range of Pacific salmon and steelhead. A total of 25 samples were available for methidathion. At the time the IRED was written the information from the NAWQA database was not used. Information on pages 9-13 of the IRED address models used to assess surface and drinking water contamination of methidathion.

The available data now indicate that methidathion has not been detected at concentrations above 1 ppb in samples taken by USGS in the NAWQA program. However, data collected in California’s DPR database for 1992-2001 show a peak concentration of 15.100 ug/L and 7 detections above 1 ug/L.

We still must note that the NAWQA sampling data, while considered high quality, are not targeted to sites and times where methidathion is used. Even regular sampling according to a predetermined schedule may not detect peak residues unless the samples happen to be taken shortly afterwards and adjacent to sites treated with methidathion.

Table 18. Methidathion Residues: Detection Frequency and Maximum Amounts Found (NAWQA)

State	# samples	% detects	max residue (ug/L)	# >1 ug/L	Note
National	23	0	no detects	0	
California	2	0	no detects	0	
Oregon	0	0	no detects	0	
Washington	0	0	no detects	0	
Idaho	0	0	no detects	0	

Table 19. California DPR Database Pesticide Residue Concentrations for Surface Waters (1992-2001)

Location	# samples	# detects	max residue (ug/L)	# >1 ug/L	Note
California*	2572	181	15.100	7	
Butte	42	1	0.055	0	
Colusa	35	2	0.970	0	
Contra Costa	1	0			
Glenn	0	0			
Merced	131	8	12.390	1	
Monterey	129	0			
Sacramento	608	23	0.212	0	
San Joaquin	28	6	2.450	1	
San Mateo	0				
Santa Clara	0				
Santa Cruz	0				
Shasta	4				
Solano	4	1	0.320	0	
Sonoma	51	0			
Stanislaus	991	112	2.140	1	
Sutter	310	23	15.100	3	
Tehama	15	0			
Yolo	85	2	0.665	0	
Yuba	34	3	1.102	1	

* only the counties in the ESUs are referenced in the table, total includes all data collected

Targeted studies

The IRED did not summarize any targeted studies for methidathion and we have since learned of none.

e. Recent changes in Methidathion registrations

Recent changes to the registration of methidathion pertain to risk mitigation for aquatic species. The following changes are being proposed during the re-registration process.

For all applications applied at rates greater than 3.0 lbs a.i./A:

- Do not apply within 50 feet of lakes, reservoirs, rivers, permanent streams, natural ponds, marshes or estuaries

For all applications applied at rates of 3.0 lbs a.i./A or less:

- Do not apply within 25 feet of lakes, reservoirs, rivers, permanent streams, natural ponds, marshes or estuaries

For ground applications:

- Shut off sprayer when turning at end rows
- Do not apply when gusts or sustained winds exceed 12 mph

For air blast application:

- Adjust deflectors and aiming devices so that spray is only directed into the canopy
- Block off upward pointed nozzles when there is no overhanging canopy
- Use only enough air volume to penetrate the canopy and provide good coverage
- Do not allow spray to go beyond the edge of the cultivated area. Spray the outside row only from outside the planting

For aerial application:

- Do not apply within 150 feet of water
- Do not apply when gusts or sustained winds exceed 8 mph

f. General risk conclusions for Methidathion

The EFED chapter summarized the ecological risks as a serious risk to the ecosystem in areas of use. EFED found that Methidathion posed an elevated risk to mammals, birds, fish and aquatic invertebrates at the acute and chronic levels.

Based solely on the most sensitive species and maximum EECs, the criteria of concern ($RQ > 0.05$) for methidathion are exceeded for direct acute effects for fish from all uses. In addition, the criteria of concern ($RQ > 1.0$) are exceeded for direct chronic effects from all uses except aerial application to apples. With respect to indirect effects that methidathion may have on invertebrate food sources for T&E salmon and steelhead, the criteria of concern ($RQ > 0.5$) for acute effects are exceeded for apples, citrus, cotton fruits, almonds and alfalfa. These uses also exceed the criteria of concern ($RQ > 1.0$) for indirect, chronic effects. The specific values by crop or site are presented for western crops in Table 20. Tables for apples, citrus and cotton can be found in the IRED, pages 43-46, attachment A-1.

Table 20. Risk Quotients (RQ) for Freshwater Fish and Invertebrates¹ on crop in ESUs

Crop	Peak EEC	Acute fish RQ	Acute invert RQ	21-day EEC	chronic invert RQ	90-day EEC	Chronic fish RQ
Aerial Application							
Fruits (CA)	15.50	7.04	2.54	12.27	18.59	7.22	1.18
Almonds(CA)	14.60	6.37	2.56	12.00	18.18	6.46	1.05
Alfalfa (OR)	9.77	4.44	1.60	8.46	12.82	4.90	0.80
Ground Application							
Fruits (CA)	10.57	4.80	1.65	8.92	13.52	4.72	0.77
ALmonds(CA)	9.85	4.47	1.61	7.77	11.77	4.04	0.66
Alfalfa (OR)	8.56	3.89	1.40	7.34	11.12	4.19	0.69

¹ Based on fish LC₅₀ (Bluegill sunfish) = 2.2 ppb; invertebrate LC₅₀ (waterflea) = 6.4 ppb; chronic invertebrate NOEC (waterflea) = 0.66 ppb; chronic fish NOEC (fathead minnow) = 6.1 ppb. Acute RQ = peak EEC/LC₅₀; chronic invertebrate RQ = 21-day EEC/invertebrate NOEC; chronic fish RQ = 60-day EEC/chronic fish NOEC

With a most sensitive fish LC50 of 2.2 ppb, the LOCs for direct acute effects for endangered species would be exceeded when methidathion concentrations in water exceed 0.11ppb ([RQ for direct effects to endangered species = concentration of methidathion/ LD₅₀ of most sensitive fish]0.05 = concentration of methidathion/2.2) . The concern for chronic risk is 6.1 ppb, based on the fish NOEL of 6.1 ppb. However, chronic exposure is not likely for methidathion.

In the IRED, RQs for methidathion were found to exceed the endangered species acute level of concern (LOC) for all uses regardless of whether the tier 1 GENEEC or tier 2 PRZM-EXAMS models were used to determine EECs.

Conclusions

The EEC is intended to determine the maximum potential risk that may occur from the use of methidathion. Therefore, it can be expected that any site-specific or species-specific analysis is likely to determine that risks are less than the maximum potential. In part, this is reflected in the western EEC scenarios, which are modified by less runoff and somewhat higher drift than eastern scenarios.

Methidathion poses a threat to freshwater fish and aquatic invertebrates through indirect and direct toxicity and exposure. However, the EEC's are based on the maximum use rates described on the label. In table 3 in the beginning of this analysis, the typical usage rates are on average half of the

maximum use rate and therefore the exposure that the T&E species may encounter may be less than that described in the EECs

Based on the magnitude of the aquatic risk quotients, freshwater and estuarine invertebrates are at greater acute and chronic risk than fish. In certain areas of use, shrimp fisheries or other commercial aquatic invertebrate operations may be adversely impacted by methidathion. Effects on invertebrate numbers and/or diversity could also affect commercial and recreational fisheries, since aquatic invertebrates are the basis of the food supply for many fish species. Aquatic organisms are most likely to be exposed to methidathion during the winter rainy season as contrasted to the rest of the year. **g. Existing protections**

The current “master label” for the 25.0% wettable powder states in the environmental hazard section:

“This pesticide is toxic to fish and wildlife. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters.

This pesticide is highly toxic to bees exposed to direct treatment or to residues remaining on the treated crop. Do not apply when bee are actively visiting the crop, cover crop, or weeds blooming in the treated areas. Applications should be timed to provide the maximum possible interval between treatment and the next period of bee activity.”

Methidathion is also included in bulletins for California. There, the Department of Pesticide Regulation (DPR) in the California Environmental Protection Agency creates county bulletins consistent with those developed by OPP. However, California also has a system of County Agricultural Commissioners responsible for pesticide regulation, and all agricultural and commercial applicators must get a permit for the use of any restricted use pesticide and must report all pesticide use, restricted or not. The California bulletins for protecting endangered species have been in use for about 5 years. Although they are currently “voluntary ” in nature, the Agricultural Commissioners strongly promote their use by pesticide applicators. Methidathion is currently included in these bulletins for the protection of aquatic organisms. The specific limitations are:

- Do not use in currently occupied habitat (see Species Descriptions table for possible exceptions)
- Provide a 20 foot minimum strip of vegetation (on which pesticides should not be applied) along rivers, creeks, streams, wetlands, vernal pools and stock ponds or on the downhill side

of fields where run-off could occur. Prepare land around fields to contain run-off by proper leveling, etc. Contain as much water “on-site” as possible. The planting of legumes, or other cover crops for several rows adjacent to off-target water sites is recommended. Mix pesticides in areas not prone to runoff such as concrete mixing/loading pads, disked soil in flat terrain or graveled mix pads, or use a suitable method to contain spills and/or rinsate. Properly empty and triple-rinse pesticide containers at the time of use.

- Conduct irrigations efficiently to prevent excessive loss of irrigation waters through run-off. Schedule irrigations and pesticide applications to maximize the interval of time between the pesticide application and the first subsequent irrigation. Allow at least 24 hours between the application of pesticides listed in this bulletin and any irrigation that results in surface run-off into natural waters. Time applications to allow sprays to dry prior to rain or sprinkler irrigations. Do not make aerial applications while irrigation water is on the field unless surface run-off is contained for 72 hours following the application.
- For sprayable or dust formulations: when the air is calm or moving away from habitat, commence applications on the side nearest the habitat and proceed away from the habitat. When air currents are moving toward habitat, do not make applications within 200 yards by air or 40 yards by ground upwind from occupied habitat. The county agricultural commissioner may reduce or waive buffer zones following a site inspection, if there is an adequate hedgerow, windbreak, riparian corridor, or other physical barrier that substantially reduces the probability of drift.

Agricultural and other commercial applicators are well sensitized to the need for protecting endangered and threatened species. DPR believes that the vast majority of agricultural applicators in California are following the limitations in these bulletins (Richard Marovich, Endangered Species Project, DPR, telephone communication, July 19, 2002).

OPP currently has proposed (67 *Federal Register* 231, 71549-71561, December 2, 2002) a final implementation program that includes labeling products to require pesticide applicators to follow provisions in county bulletins. The comment period has closed, and a final *Federal Register* Notice is under development and is anticipated to be published in 2004. After this notice becomes final, it is expected that pesticide registrants will be required, as appropriate, to put on their products label statements mandating that applicators follow the label and county bulletins. It is also anticipated that these will be enforceable under FIFRA, including the California bulletins. Any measures necessary to protect T&E salmon and steelhead from methidathion would most likely be promulgated through this system.

4. Description of Pacific Salmon and Steelhead Evolutionarily Significant Units (ESU)

Relative to Methidathion Use Sites

Please note that OPP will be transmitting a separate analysis of ESUs and their critical habitat to NMFS. We have noted this in previous consultation requests, but it is taking somewhat longer than anticipated. This analysis will include what we perceive to be the most appropriate boundaries for designated critical habitat. We will be requesting comments from NMFS on the counties to be included. Depending upon NMFS comments, we will make any corrections and then will compare the results with those consultation packages previously transmitted. We do not believe that any corrections will materially change the risk assessments. However, adjustments may result in changes on where protective measures need to be taken after consultation is completed. We are not asking for comments on ESU locations as part of this particular package. (Charts containing information on ESU's in the pacific northwest can be found in attachment E and for California in attachment D)

(a) Steelhead

Steelhead, *Oncorhynchus mykiss*, exhibit one of the most complex suites of life history traits of any salmonid species. Steelhead may exhibit anadromy or freshwater residency. Resident forms are usually referred to as “rainbow” or “redband” trout, while anadromous life forms are termed “steelhead.” The relationship between these two life forms is poorly understood; however, the scientific name was recently changed to represent that both forms are a single species.

Steelhead typically migrate to marine waters after spending 2 years in fresh water. They then reside in marine waters for typically 2 or 3 years prior to returning to their natal stream to spawn as 4-or 5-year-olds. Unlike Pacific salmon, they are capable of spawning more than once before they die. However, it is rare for steelhead to spawn more than twice before dying; most that do so are females. Steelhead adults typically spawn between December and June.

Depending on water temperature, steelhead eggs may incubate in redds (spawning beds) for 1.5 to 4 months before hatching as alevins. Following yolk sac absorption, alevins emerge as fry and begin actively feeding. Juveniles rear in fresh water from 1 to 4 years, then migrate to the ocean as “smolts.”

Biologically, steelhead can be divided into two reproductive ecotypes. “Stream maturing” or “summer steelhead” enter fresh water in a sexually immature condition and require several months to mature and spawn. “Ocean maturing” or “winter steelhead” enter fresh water with well-developed gonads and spawn shortly after river entry. There are also two major genetic groups, applying to both anadromous and nonanadromous forms: a coastal group and an inland group, separated approximately by the Cascade crest in Oregon and Washington. California is thought to have only coastal steelhead while Idaho has only inland steelhead.

Historically, steelhead were distributed throughout the North Pacific Ocean from the Kamchatka Peninsula in Asia to the northern Baja Peninsula, but they are now known only as far south as the Santa Margarita River in San Diego County. Many populations have been extirpated.

(1) Southern California Steelhead ESU

The Southern California steelhead ESU was proposed for listing as endangered on August 9, 1996 (61FR41541-41561) and the listing was made final a year later (62FR43937-43954, August 18, 1997). Critical Habitat was proposed February 5, 1999 (64FR5740-5754) and designated on February 16, 2000 (65FR7764-7787). This ESU ranges from the Santa Maria River in San Luis Obispo County south to San Mateo Creek in San Diego County. Steelhead from this ESU may also occur in Santa Barbara, Ventura and Los Angeles counties, but this ESU apparently is no longer considered to be extant in Orange County (65FR79328-79336, December 19, 2000). The San Mateo Creek watershed also includes a small portion of the southwest corner of Riverside County, but the area is in the Cleveland National Forest. Hydrologic units in this ESU are Cuyama (upstream barrier - Vaquero Dam), Santa Maria, San Antonio, Santa Ynez (upstream barrier - Bradbury Dam), Santa Barbara Coastal, Ventura (upstream barriers - Casitas Dam, Robles Dam, Matilja Dam, Vern Freeman Diversion Dam), Santa Clara (upstream barrier - Santa Felicia Dam), Calleguas, and Santa Monica Bay (upstream barrier - Rindge Dam). Counties comprising this ESU show a very high percentage of declining and extinct populations.

River entry ranges from early November through June, with peaks in January and February. Spawning primarily begins in January and continues through early June, with peak spawning in February and March.

Within San Diego County, the San Mateo Creek runs through Camp Pendleton Marine Base and into the Cleveland National Forest. While there are agricultural uses of pesticides in other parts of California within the range of this ESU, it would appear that there are no such uses in the vicinity of San Mateo Creek. Within Los Angeles County, this steelhead occurs in Malibu Creek and possibly Topanga Creek. Neither of these creeks drain agricultural areas.

Reportable usage of methidathion in counties where this ESU occurs are presented in Table 1 in attachment D.

There is a little methidathion used within this ESU, essentially on artichokes. Given the small amount of usage in this ESU, the likelihood for effects from these uses seems low enough that in conjunction with the county bulletins, I conclude that the use of methidathion will have no effect on the Southern California Steelhead ESU.

(2) South Central California Steelhead ESU

The South Central California steelhead ESU was proposed for listing as endangered on August 9, 1996 (61FR41541-41561) and the listing was made final, as threatened, a year later (62FR43937-43954, August 18, 1997). Critical Habitat was proposed February 5, 1999 (64FR5740-5754) and designated on February 16, 2000 (65FR7764-7787). This coastal steelhead ESU occupies rivers from the Pajaro River, Santa Cruz County, to (but not including) the Santa Maria River, San Luis Obispo County. Most rivers in this ESU drain the Santa Lucia Mountain Range, the southernmost unit of the California Coast Ranges (62FR43937-43954, August 18, 1997). River entry ranges from late November through March, with spawning occurring from January through April.

This ESU includes the hydrologic units of Pajaro (upstream barriers - Chesbro Reservoir, North Fork Pachero Reservoir), Estrella, Salinas (upstream barriers - Nacimiento Reservoir, Salinas Dam, San Antonio Reservoir), Central Coastal (upstream barriers - Lopez Dam, Whale Rock Reservoir), Alisal-Elkhorn Sloughs, and Carmel. Counties of occurrence include Santa Cruz, Santa Clara, San Benito, Monterey, and San Luis Obispo.

There is considerable agriculture in most counties within this ESU. There is a potential for steelhead waters to drain agricultural areas. Reportable usage of methidathion in counties where this ESU occurs are presented in Table 2 in attachment D.

There is a modest amount (11, 903 lbs) of methidathion used within this ESU. Given the usage is in only Monterey county where there is a large amount of agriculture in conjunction with the county bulletins, the likelihood for effects from these uses seems low enough that I conclude that the use of methidathion may effect, but is not likely to adversely affect, South-Central California Steelhead ESU.

(3) Central California Coast Steelhead ESU

The Central California coast steelhead ESU was proposed for listing as endangered on August 9, 1996 (61FR41541-41561) and the listing was made final, as threatened, a year later (62FR43937-43954, August 18, 1997). Critical Habitat was proposed February 5, 1999 (64FR5740-5754) and designated on February 16, 2000 (65FR7764-7787). This coastal steelhead ESU occupies California river basins from the Russian River, Sonoma County, to Aptos Creek, Santa Cruz County, (inclusive), and the drainages of San Francisco and San Pablo Bays eastward to the Napa River (inclusive), Napa County. The Sacramento-San Joaquin River Basin of the Central Valley of California is excluded. Steelhead in most tributary streams in San Francisco and San Pablo Bays appear to have been extirpated, whereas most coastal streams sampled in the central California coast region do contain steelhead.

Only winter steelhead are found in this ESU and those to the south. River entry ranges from October in the larger basins, late November in the smaller coastal basins, and continues through June. Steelhead spawning begins in November in the larger basins, December in the smaller coastal basins, and can continue through April with peak spawning generally in February and March. Hydrologic units in this ESU include Russian (upstream barriers - Coyote Dam, Warm Springs Dam), Bodega Bay, Suisun Bay, San Pablo Bay (upstream barriers – Phoenix Dam, San Pablo Dam), Coyote (upstream barriers - Almaden, Anderson, Calero, Guadalupe, Stevens Creek, and Vasona Reservoirs, Searsville Lake), San Francisco Bay (upstream barriers - Calveras Reservoir, Chabot Dam, Crystal Springs Reservoir, Del Valle Reservoir, San Antonio Reservoir), San Francisco Coastal South (upstream barrier - Pilarcitos Dam), and San Lorenzo- Soquel (upstream barrier - Newell Dam).

Counties of occurrence for this ESU are Santa Cruz, San Mateo, San Francisco, Marin, Sonoma, Mendocino, Napa, Alameda, Contra Costa, Solano, and Santa Clara. Counties with methidathion use in this ESU are in table 3 in attachment D.

There is a small amount of methidathion used within this ESU, essentially on apples. The likelihood for effects from these uses seems low. However, due to the fact that methidathion is used in the dormant period, its toxicity to freshwater organisms even in conjunction with the county bulletins, I conclude that the use of methidathion may affect but is not likely to adversely affect the Central California Steelhead ESU

(4) California Central Valley Steelhead ESU

The California Central Valley steelhead ESU was proposed for listing as endangered on August 9, 1996 (61FR41541-41561) and the listing was made final in 1998 (63FR 13347-13371, March 18, 1998). Critical Habitat was proposed February 5, 1999 (64FR5740-5754) and designated on February 16, 2000 (65FR7764-7787).

This ESU includes populations ranging from Shasta, Trinity, and Whiskeytown areas, along with other Sacramento River tributaries in the North, down the Central Valley along the San Joaquin River to and including the Merced River in the South, and then into San Pablo and San Francisco Bays. Counties at least partly within this area are Alameda, Amador, Butte, Calaveras, Colusa, Contra Costa, Glenn, Marin, Merced, Napa, Nevada, Placer, Sacramento, San Benito, San Francisco, San Joaquin, San Mateo, San Francisco, Santa Clara, Shasta, Solano, Sonoma, Stanislaus, Sutter, Tehama, Tuloumne, Yolo, and Yuba. A large proportion of this area is heavily agricultural, but there are also large amounts of urban and suburban areas. Usage of methidathion in counties where the California Central Valley steelhead ESU occurs is presented in table 4 in attachment D.

There is a considerable amount of methidathion used within this ESU. In particular walnuts and almonds have high usage. Due to the toxicity of methidathion to freshwater organisms even in conjunction with the county bulletins, I conclude that the use of methidathion may affect Central Valley California Steelhead ESU.

(5) Northern California Steelhead ESU

The Northern California steelhead ESU was proposed for listing as threatened on February 11, 2000 (65FR6960-6975) and the listing was made final on June 7, 2000 (65FR36074-36094). Critical Habitat has not yet been officially established. This Northern California coastal steelhead ESU occupies river basins from Redwood Creek in Humboldt County, CA to the Gualala River, inclusive, in Mendocino County, CA. River entry ranges from August through June and spawning from December through April, with peak spawning in January in the larger basins and in late February and March in the smaller coastal basins. The Northern California ESU has both winter and summer steelhead, including what is presently considered to be the southernmost population of summer steelhead, in the Middle Fork Eel River. Counties included appear to be Humboldt, Mendocino, Trinity, Glenn, Lake, and Sonoma. Glenn and Lake counties are excluded from this particular analysis because the hydrologic units in these counties are entirely within the Mendocino National Forest, where there would be no methidathion usage.

There is no reported usage of methidathion within this ESU. I conclude that there will be no effect of methidathion on the **Northern California Steelhead ESU**.

(6) Upper Columbia River Steelhead ESU

The Upper Columbia River steelhead ESU was proposed for listing as endangered on August 9, 1996 (61FR41541-41561) and the listing was made final a year later (62FR43937-43954, August 18, 1997). Critical Habitat was proposed February 5, 1999 (64FR5740-5754) and designated on February 16, 2000 (65FR7764-7787).

The Upper Columbia River steelhead ESU ranges from several northern rivers close to the Canadian border in central Washington (Okanogan and Chelan counties) to the mouth of the Columbia River. The primary area for spawning and growth through the smolt stage of this ESU is from the Yakima River in south Central Washington upstream. Hydrologic units within the spawning and rearing habitat of the Upper Columbia River steelhead ESU and their upstream barriers are Chief Joseph (upstream barrier - Chief Joseph Dam), Okanogan, Similkameen, Methow, Upper Columbia-Entiat, Wenatchee, Moses-Coulee, and Upper Columbia-Priest Rapids. Within the spawning and rearing areas, counties are Chelan, Douglas, Okanogan, Grant, Benton, Franklin, Kittitas, and Yakima, all in Washington.

Note: Adams County, WA was not one of the counties named in the critical habitat FR Notice, but appears to be included in a hydrologic unit named in that notice. We have included it here, but seek NMFS guidance for future efforts.

Areas downstream from the Yakima River are used for migration. Additional counties through which the ESU migrates are Walla Walla, Klickitat, Skamania, Clark, Cowlitz, Wahkiakum, and Pacific, Washington; and Gilliam, Morrow, Sherman, Umatilla, Wasco, Hood River, Multnomah, Columbia, and Clatsop, Oregon.

Table 7 in attachment E shows the cropping information where methidathion can be used in Washington counties where the Upper Columbia River steelhead ESU is located and migrates. In this table, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a substantial amount of methidathion used within this ESU. Given the toxicity of methidathion, and the amount of potential use in this ESU, I conclude that the use of methidathion may affect Upper Columbia River - Steelhead ESU.

(7) Snake River Basin Steelhead ESU

The Snake River Basin steelhead ESU was proposed for listing as endangered on August 9, 1996 (61FR41541-41561) and the listing was made final a year later (62FR43937-43954, August 18, 1997). Critical Habitat was proposed February 5, 1999 (64FR5740-5754) and designated on February 16, 2000 (65FR7764-7787).

Spawning and early growth areas of this ESU consist of all areas upstream from the confluence of the Snake River and the Columbia River as far as fish passage is possible. Hells Canyon Dam on the Snake River and Dworshak Dam on the Clearwater River, along with Napias Creek Falls near Salmon, Idaho, are named as impassable barriers. These areas include the counties of Wallowa, Baker, Union, and Umatilla (northeastern part) in Oregon; Asotin, Garfield, Columbia, Whitman, Franklin, Walla Walla, Adams, Lincoln, and Spokane in Washington; and Adams, Idaho, Nez Perce, Blaine, Custer, Lemhi, Boise, Valley, Lewis, Clearwater, and Latah in Idaho.

We have excluded Baker County, Oregon, which has a tiny fragment of the Imnaha River. We have similarly excluded the Upper Grande Ronde watershed tributaries (e.g., Looking Glass and Cabin Creeks) that are barely into higher elevation forested areas of Umatilla County. In Idaho, Blaine and Boise counties technically have waters that are part of the steelhead ESU, but again, these are tiny areas which occur in the Sawtooth National Recreation Area and/or National Forest lands. These areas are not relevant to use of **methidathion**. The agricultural areas of Valley County, Idaho, appear

to be primarily associated with the Payette River watershed, but there is enough of the Salmon River watershed in this county it was included.

Note: We are uncertain about the inclusion of Adams, Lincoln and Spokane counties in Washington in this ESU. They are not named in the Critical Habitat FR Notice, but they appear to include waters in the listed hydrologic unit. We have included them below, but will be seeking NMFS guidance in a separate request.

Critical Habitat also includes the migratory corridors of the Columbia River from the confluence of the Snake River to the Pacific Ocean. Additional counties in the migratory corridors are Umatilla, Gilliam, Morrow, Sherman, Wasco, Hood River, Multnomah, Columbia, and Clatsop in Oregon; and Walla Walla, Benton, Klickitat, Skamania, Clark, Cowlitz, Wahkiakum, and Pacific in Washington.

Table 21 in attachment E shows the cropping information for the Pacific Northwest counties where the Snake River Basin steelhead ESU is spawning and for the Oregon and Washington counties where this ESU migrates. In these tables, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a rather large amount of acreage that could potentially be treated with methidathion within this ESU. Given that the potential usage of methidathion is greater than 20,000 lbs in both spawning and migratory areas, the likelihood for effects from these uses cannot be precluded. Therefore, I conclude that the use of methidathion may affect the Snake River Basin Steelhead ESU within its breeding areas.

(8) Upper Willamette River steelhead ESU

The Upper Willamette River steelhead ESU was proposed for listing as threatened on March 10, 1998 (63FR11798-11809) and the listing was made final a year later (64FR14517-14528, March 25, 1999). Critical Habitat was proposed February 5, 1999 (64FR5740-5754) and designated on February 16, 2000 (65FR7764-7787). Only naturally spawned, winter steelhead trout are included as part of this ESU; where distinguishable, summer-run steelhead trout are not included.

Spawning and rearing areas are river reaches accessible to listed steelhead in the Willamette River and its tributaries above Willamette Falls up through the Calapooia River. This includes most of Benton, Linn, Polk, Clackamas, Marion, Yamhill, and Washington counties, and small parts of Lincoln and Tillamook counties.

Hydrologic units where spawning and rearing occur are Upper Willamette, North Santiam (upstream

barrier - Big Cliff Dam), South Santiam (upstream barrier - Green Peter Dam), Middle Willamette, Yamhill, Molalla-Pudding, and Tualatin. The areas below Willamette Falls and downstream in the Columbia River are considered migration corridors, and include Multnomah, Columbia, and Clatsop counties, Oregon, and Clark, Cowlitz, Wahkiakum, and Pacific counties, Washington.

Table 20 in attachment E show the cropping information for Oregon counties where the Upper Willamette River steelhead ESU spawns and for the Oregon and Washington counties where this ESU migrates. In these tables, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a large amount of acreage that could potentially be treated with methidathion within this ESU. Due to the high usage (mostly on walnuts) and the toxicity of methidathion, the likelihood for effects from these uses cannot be precluded. Therefore, I conclude that the use of methidathion may affect the Upper Willamette River Steelhead ESU.

(9) Lower Columbia River Steelhead ESU

The Lower Columbia River steelhead ESU was proposed for listing as endangered on August 9, 1996 (61FR41541-41561) and the listing was made final a year later (62FR43937-43954, August 18, 1997). Critical Habitat was proposed February 5, 1999 (64FR5740-5754) and designated on February 16, 2000 (65FR7764-7787).

This ESU includes all tributaries from the lower Willamette River (below Willamette Falls) to Hood River in Oregon, and from the Cowlitz River up to the Wind River in Washington. These tributaries would provide the spawning and presumably the growth areas for the young steelhead. It is not clear if the young and growing steelhead in the tributaries would use the nearby mainstem of the Columbia prior to downstream migration. If not, the spawning and rearing habitat would occur in Hood River, Clackamas, and Multnomah counties in Oregon, and Skamania, Clark, Cowlitz, and Lewis counties in Washington. Tributaries of the extreme lower Columbia River, e.g., Grays River in Pacific and Wahkiakum counties, Washington and John Day River in Clatsop county, Oregon, are not discussed in the Critical Habitat FRNs; because they are not “between” the specified tributaries, they do not appear part of the spawning and rearing habitat for this steelhead ESU. The mainstem of the Columbia River from the mouth to Hood River constitutes the migration corridor. This would additionally include Columbia and Clatsop counties, Oregon, and Pacific and Wahkiakum counties, Washington.

Hydrologic units for this ESU are Middle Columbia-Hood, Lower Columbia-Sandy (upstream barrier - Bull Run Dam 2), Lewis (upstream barrier - Merlin Dam), Lower Columbia- Clatskanie, Lower Cowlitz, Lower Columbia, Clackamas, and Lower Willamette.

Table 19 in attachment E shows the cropping information for Oregon and Washington counties where the Lower Columbia River steelhead ESU is spawning and for the Oregon and Washington counties where this ESU migrates. In these tables, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a moderate amount of acreage that could potentially be treated with methidathion within this ESU. However, the bulk of Clackamas County acreage is most likely not in the watershed of this ESU. For these reasons, along with the toxicity of methidathion for aquatic organisms, I conclude that the use of methidathion may affect, but is not likely to adversely affect, the Lower Columbia River Steelhead ESU.

(10) Middle Columbia River Steelhead ESU

The Middle Columbia River steelhead ESU was proposed for listing as threatened on March 10, 1998 (63FR11798-11809) and the listing was made final a year later (64FR14517-14528, March 25, 1999). Critical Habitat was proposed February 5, 1999 (64FR5740-5754) and designated on February 16, 2000 (65FR7764-7787).

This steelhead ESU occupies “the Columbia River Basin and tributaries from above the Wind River in Washington and the Hood River in Oregon (exclusive), upstream to, and including, the Yakima River, in Washington.” The Critical Habitat designation indicates the downstream boundary of the ESU to be Mosier Creek in Wasco County, Oregon; this is consistent with Hood River being “excluded ” in the listing notice. No downstream boundary is listed for the Washington side of the Columbia River, but if Wind River is part of the Lower Columbia steelhead ESU, it appears that Collins Creek, Skamania County, Washington would be the last stream down river in the Middle Columbia River ESU. Dog Creek may also be part of the ESU, but White Salmon River certainly is, since the Condit Dam is mentioned as an upstream barrier.

The only other upstream barrier, in addition to Condit Dam on the White Salmon River, is the Pelton Dam on the Deschutes River. As an upstream barrier, this dam would preclude steelhead from reaching the Metolius and Crooked Rivers as well the upper Deschutes River and its tributaries.

In the John Day River watershed, we have excluded Harney County, Oregon because there is only a tiny amount of the John Day River and several tributary creeks (e.g., Utley, Bear Cougar creeks) which get into high elevation areas (approximately 1700M and higher) of northern Harney County where there are no crops grown. Union and Wallowa Counties, Oregon were excluded because the small reaches of the Umatilla and Walla Walla Rivers in these counties occur in high elevation areas where crops are not grown.

The Oregon counties then that appear to have spawning and rearing habitat are Gilliam, Morrow, Umatilla, Sherman, Wasco, Crook, Grant, Wheeler, and Jefferson counties. Washington counties providing spawning and rearing habitat would be Benton, Franklin, Kittitas, Klickitat, Skamania, Walla Walla, and Yakima. Only small portions of Franklin and Skamania Counties intersect with the spawning and rearing habitat of this ESU.

Migratory corridors include Hood River, Multnomah, Columbia, and Clatsop counties in Oregon, and Skamania, Clark, Cowlitz, Wahkiakum, and Pacific Counties in Washington.

Table 26 in attachment E shows the cropping information for Oregon and Washington counties where the Middle Columbia River steelhead ESU is located and for the Oregon and Washington counties where this ESU migrates. In these tables, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is considerable amount of acreage that could potentially be treated with methidathion within this ESU, especially on pome fruits. Given the amount of potential usage of 2800 lbs in migratory areas and 41,000 lbs of potential use in spawning areas and the toxicity, I conclude that the use of methidathion may affect the Middle Columbia River Steelhead ESU.

(b) Chinook salmon

Chinook salmon (*Oncorhynchus tshawytscha*) is the largest salmon species; adults weighing over 120 pounds have been caught in North American waters. Like other Pacific salmon, chinook salmon are anadromous and die after spawning.

Juvenile stream-and ocean-type chinook salmon have adapted to different ecological niches. Ocean-type chinook salmon, commonly found in coastal streams, tend to utilize estuaries and coastal areas more extensively for juvenile rearing. They typically migrate to sea within the first three months of emergence and spend their ocean life in coastal waters. Summer and fall runs predominate for ocean-type chinook. Stream-type chinook are found most commonly in headwater streams and are much more dependent on freshwater stream ecosystems because of their extended residence in these areas. They often have extensive offshore migrations before returning to their natal streams in the spring or summer months. Stream-type smolts are much larger than their younger ocean-type counterparts and are therefore able to move offshore relatively quickly.

Coast wide, chinook salmon typically remain at sea for 2 to 4 years, with the exception of a small proportion of yearling males (called jack salmon) which mature in freshwater or return after 2 or 3 months in salt water. Ocean-type chinook salmon tend to migrate along the coast, while stream-type chinook salmon are found far from the coast in the central North Pacific. They return to their natal

streams with a high degree of fidelity. Seasonal “runs” (i.e., spring, summer, fall, or winter), which may be related to local temperature and water flow regimes, have been identified on the basis of when adult chinook salmon enter freshwater to begin their spawning migration. Egg deposition must occur at a time to ensure that fry emerge during the following spring when the river or estuary productivity is sufficient for juvenile survival and growth.

Adult female chinook will prepare a spawning bed, called a redd, in a stream area with suitable gravel composition, water depth and velocity. After laying eggs in a redd, adult chinook will guard the redd from 4 to 25 days before dying. Chinook salmon eggs will hatch, depending upon water temperatures, between 90 to 150 days after deposition. Juvenile chinook may spend from 3 months to 2 years in freshwater after emergence and before migrating to estuarine areas as smolts, and then into the ocean to feed and mature. Historically, chinook salmon ranged as far south as the Ventura River, California, and their northern extent reaches the Russian Far East.

(1) Sacramento River Winter-run Chinook Salmon ESU

The Sacramento River Winter-run chinook was emergency listed as threatened with critical habitat designated in 1989 (54FR32085-32088, August 4, 1989). This emergency listing provided interim protection and was followed by (1) a proposed rule to list the winter-run on March 20, 1990, (2) a second emergency rule on April 20, 1990, and (3) a formal listing on November 20, 1990 (59FR440-441, January 4, 1994). A somewhat expanded critical habitat was proposed in 1992 (57FR36626-36632, August 14, 1992) and made final in 1993 (58FR33212-33219, June 16, 1993). In 1994, the winter-run was reclassified as endangered because of significant declines and continued threats (59FR440-441, January 4, 1994).

Critical Habitat has been designated to include the Sacramento River from Keswick Dam, Shasta County (river mile 302) to Chipps Island (river mile 0) at the west end of the Sacramento-San Joaquin delta, and then westward through most of the fresh or estuarine waters, north of the Oakland Bay Bridge, to the ocean. Estuarine sloughs in San Pablo and San Francisco bays (including San Mateo and Santa Clara counties) are excluded (58FR33212-33219, June 16, 1993). Reportable usage of methidathion in counties where this ESU occurs are presented in Table 9 in attachment D.

There is a moderate amount of methidathion usage within this ESU. However, breeding area of the Sacramento River Winter-run chinook salmon is in the Sacramento River rather than tributaries. Therefore despite the acreage, especially in conjunction with the county bulletins, I conclude that the use of methidathion may affect, but is not likely to adversely affect the Sacramento River Winter-run Chinook Salmon ESU.

(2) Snake River Fall-run Chinook Salmon ESU

The Snake River fall-run chinook salmon ESU was proposed as threatened in 1991 (56FR29547-29552, June 27, 1991) and listed about a year later (57FR14653-14663, April 22, 1992). Critical habitat was designated on December 28, 1993 (58FR68543-68554) to include all tributaries of the Snake and Salmon Rivers accessible to Snake River fall-run chinook salmon, except reaches above impassable natural falls and Dworshak and Hells Canyon Dams. The Clearwater River and Palouse River watersheds are included for the fall-run ESU, but not for the spring/summer run.

This chinook ESU was proposed for reclassification on December 28, 1994 (59FR66784-57403) as endangered because of critically low levels, based on very sparse runs. However, because of increased runs in subsequent year, this proposed reclassification was withdrawn (63FR1807-1811, January 12, 1998).

In 1998, NMFS proposed to revise the Snake River fall-run chinook to include those stocks using the Deschutes River (63FR11482-11520, March 9, 1998). The John Day, Umatilla, and Walla Walla Rivers would be included; however, fall-run chinook in these rivers are believed to have been extirpated. It appears that this proposal has yet to be finalized.

Hydrologic units with spawning and rearing habitat for this fall-run chinook are the Clearwater, Hells Canyon, Imnaha, Lower Grande Ronde, Lower North Fork Clearwater, Lower Salmon, Lower Snake-Asotin, Lower Snake-Tucannon, and Palouse. The proposed revision of the ESU adds the Lower Deschutes, Trout, Lower John Day, Upper John Day, North Fork - John Day, Middle Fork - John Day, Willow, Umatilla, and Walla Walla hydrologic units. It appears that no additions have been proposed for Washington tributaries to the Columbia River. These units are in Wasco, Jefferson, Crook, Sherman, Gilliam, Wheeler, Morrow, Baker, Umatilla, Grant, Harney, Wallowa, and Union counties in Oregon; Adams, Asotin, Columbia, Franklin, Garfield, Lincoln, Spokane, Walla Walla, and Whitman counties in Washington; and Adams, Benewah, Clearwater, Idaho, Latah, Lewis, Nez Perce, Shoshone, and Valley counties in Idaho.

Wasco, Jefferson, Sherman, Gilliam, Wheeler, Morrow, Crook, Harney, and Grant Counties were included to encompass the more recent definition including the Deschutes and John Day Rivers. However, because the FR Notice indicated that this ESU was extirpated in the John Day, Umatilla, and Walla Walla rivers, we have excluded Wheeler, Grant, and Harney counties from the analysis, and also Umatilla County except as part of the migratory corridor. We have retained Wasco, Sherman, and Jefferson counties along the lower Deschutes River and Gilliam and Morrow counties along Willow Creek as potential spawning and rearing habitat. We also excluded Crook County because it is above Pelton Dam.

As explained previously, we have excluded the high elevation sliver of Imnaha Creek in Baker County. In addition, we have re-examined other watershed considerations that we made in previous

consultation analyses. Because Palouse Falls is an upstream barrier to passage, we are now excluding Adams, Lincoln, and Spokane counties in Washington from this ESU analysis. As best as we can tell, it appears that Benewah County, ID was also included in the counties in the Critical Habitat FR Notice as part of the Palouse River watershed, and we have therefore excluded it also. Finally, it appears that waters in Shoshone County, ID are all above Dworshak Dam, which is an upstream barrier. As a result of this re-examination, we now consider that spawning and rearing habitat for the Snake River fall chinook includes Nez Perce, Latah, Lewis, Clearwater, Adams, Idaho, and Valley counties in Idaho; Wallowa, Union, and the newly added Wasco, Sherman, Jefferson, Gilliam and Morrow counties in Oregon; and Asotin, Columbia, Franklin, Garfield, Walla Walla, and Whitman counties in Washington. For this particular analysis, we have excluded Valley County, Idaho because that portion in the Salmon River watershed is all in forested areas where methidathion would not be used; the private land areas of Valley County where methidathion could be used are in the Payette River watershed. As always, we solicit NMFS comments on these counties to included or excluded.

The migratory corridor of Snake River fall-run chinook includes the additional counties of Umatilla, Hood River, Multnomah, Columbia, and Clatsop in Oregon, and Benton, Klickitat, Skamania, Clark, Cowlitz, Wahkiakum, and Pacific in Washington.

Tables 24 in attachment E shows the cropping information for Pacific Northwest counties where the Snake River fall-run chinook salmon ESU spawns and migrates. In these tables, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a substantial amount of acreage that could potentially be treated with methidathion within this ESU, especially pome fruits. Given the factors discussed above, the likelihood for effects from these uses cannot be precluded. Therefore, I conclude that the use of methidathion may affect the Snake River Fall-run Chinook Salmon ESU.

(3) Snake River Spring/Summer-run Chinook Salmon

The Snake River Spring/Summer-run chinook salmon ESU was proposed as threatened in 1991 (56FR29542-29547, June 27, 1991) and listed about a year later (57FR14653-14663, April 22, 1992). Critical habitat was designated on December 28, 1993 (58FR68543-68554) to include all tributaries of the Snake and Salmon Rivers (except the Clearwater River) accessible to Snake River spring/summer chinook salmon. Like the fall-run chinook, the spring/summer-run chinook ESU was proposed for reclassification on December 28, 1994 (59FR66784-57403) as endangered because of critically low levels, based on very sparse runs. However, because of increased runs in subsequent year, this proposed reclassification was withdrawn (63FR1807-1811, January 12, 1998).

Hydrologic units in the potential spawning and rearing areas include Hells Canyon, Imnaha, Lemhi, Little Salmon, Lower Grande Ronde, Lower Middle Fork Salmon, Lower Salmon, Lower Snake-Asotin, Lower Snake-Tucannon, Middle Salmon-Chamberlain, Middle Salmon-Panther, Pashimerol, South Fork Salmon, Upper Middle Fork Salmon, Upper Grande Ronde, Upper Salmon, and Wallowa. Areas above Hells Canyon Dam are excluded, along with unnamed “impassable natural falls.” Napias Creek Falls, near Salmon, Idaho, was later named an upstream barrier (64FR57399-57403, October 25, 1999). The Grande Ronde, Imnaha, Salmon, and Tucannon subbasins, and Asotin, Granite, and Sheep Creeks were specifically named in the Critical Habitat Notice.

Spawning and rearing counties mentioned in the Critical Habitat Notice include Union, Umatilla, and Wallowa, and Baker counties in Oregon; Adams, Blaine, Custer, Idaho, Lemhi, Lewis, and Nez Perce, and Valley counties in Idaho; and Asotin, Columbia, Franklin, Garfield, Walla Walla, and Whitman counties in Washington. We have excluded Umatilla and Baker County in Oregon and Blaine County in Idaho because accessible river reaches are all well above areas where methidathion can be used. We have excluded Valley County, Idaho because that portion in the Salmon River watershed is all in forested areas where methidathion would not be used; the private land areas of Valley County where methidathion could be used are in the Payette River watershed. Other counties within migratory corridors are all of those down stream from the confluence of the Snake and Columbia Rivers: Umatilla, Morrow, Gilliam, Sherman, Wasco, Hood River, Multnomah, Columbia, and Clatsop Counties in Oregon, and Klickitat, Skamania, Clark, Cowlitz, Wahkiakum, and Pacific Counties in Washington.

Table 7 in attachment E shows the crop-acreage information for Oregon and Washington counties where the Snake River spring/summer-run chinook salmon ESU spawns and migrates. If there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a considerable amount of acreage that could potentially be treated with methidathion within this ESU, especially pome fruits where there is considerable usage. Given these factors and the toxicity of methidathion, I conclude that the use of methidathion may affect the Snake River Spring/summer-run Chinook Salmon ESU.

(4) Central Valley Spring-run Chinook Salmon ESU

The Central Valley Spring-run chinook salmon ESU was proposed as threatened in 1998 (63FR11482-11520, March 9, 1998) and listed on September 16, 1999 (64FR50393-50415). Critical habitat was designated February 16, 2000 (65FR7764-7787) to encompass all river reaches accessible to listed chinook salmon in the Sacramento River and its tributaries in California, along with the downstream river reaches into San Francisco Bay, north of the Oakland Bay Bridge, and

to the Golden Gate Bridge.

Hydrologic units and upstream barriers within this ESU are the Sacramento-Lower Cow-Lower Clear, Lower Cottonwood, Sacramento-Lower Thomes (upstream barrier - Black Butte Dam), Sacramento-Stone Corral, Lower Butte (upstream barrier - Centerville Dam), Lower Feather (upstream barrier - Oroville Dam), Lower Yuba, Lower Bear (upstream barrier – Camp Far West Dam), Lower Sacramento, Sacramento-Upper Clear (upstream barriers – Keswick Dam, Whiskeytown dam), Upper Elder-Upper Thomes, Upper Cow-Battle, Mill-Big Chico, Upper Butte, Upper Yuba (upstream barrier - Englebright Dam), Suisin Bay, San Pablo Bay, and San Francisco Bay. These areas are in the counties of Shasta, Tehama, Butte, Glenn, Colusa, Sutter, Yolo, Yuba, Placer, Sacramento, Solano, Nevada, Contra Costa, Napa, Alameda, Marin, Sonoma, San Mateo, San Francisco, and Santa Clara. However, Santa Clara and San Mateo counties are south of the Oakland Bay Bridge and are not included in the analysis.

Table 10 in attachment D contains usage information for the California counties supporting the Central Valley spring-run chinook salmon ESU.

There is a large use of methidathion within this ESU, especially in Sutter county. Given the toxicity of methidathion and in conjunction with the county bulletins, I conclude that the use of methidathion may affect, but is not likely to adversely affect, the Central Valley Spring-run Chinook Salmon ESU.

(5) California Coastal Chinook Salmon ESU

The California coastal chinook salmon ESU was proposed as threatened in 1998 (63FR11482-11520, March 9, 1998) and listed on September 16, 1999 (64FR50393-50415). Critical habitat was designated February 16, 2000 (65FR7764-7787) to encompass all river reaches and estuarine areas accessible to listed chinook salmon from Redwood Creek (Humboldt County, California) to the Russian River (Sonoma County, California), inclusive.

The hydrologic units and upstream barriers are Mad-Redwood, Upper Eel (upstream barrier - Scott Dam), Middle Fort Eel, Lower Eel, South Fork Eel, Mattole, Big-Navarro-Garcia, Gualala-Salmon, Russian (upstream barriers - Coyote Dam; Warm Springs Dam), and Bodega Bay. Counties with agricultural areas where pesticides could be used are Humboldt, Trinity, Mendocino, Sonoma, and Marin. A small portion of Glenn County is also included in the Critical Habitat. A small portion of Lake County contains habitat for this ESU, but is entirely within the Mendocino National Forest.

There is no reported usage of methidathion within this ESU. I conclude that there will be no effect of methidathion on the California Coastal Chinook Salmon ESU.

(6) Puget Sound Chinook Salmon ESU

The Puget Sound chinook salmon ESU was proposed as threatened in 1998 (63FR11482-11520, March 9, 1998) and listed a year later (64FR14308-14328, March 24, 1999). Critical habitat was designated February 16, 2000 (65FR7764-7787) to encompass all marine, estuarine, and river reaches accessible to listed chinook salmon in Puget Sound and its tributaries, extending out to the Pacific Ocean.

The hydrologic units and upstream barriers are the Strait of Georgia, San Juan Islands, Nooksack, Upper Skagit, Sauk, Lower Skagit, Stillaguamish, Skykomish, Snoqualmie (upstream barrier - Tolt Dam), Snohomish, Lake Washington (upstream barrier – Landsburg Diversion), Duwamish, Puyallup, Nisqually (upstream barrier - Alder Dam), Deschutes, Skokomish, Hood Canal, Puget Sound, Dungeness-Elwha (upstream barrier - Elwha Dam). Affected counties in Washington, apparently all of which could have spawning and rearing habitat, are Skagit, Whatcom, San Juan, Island, Snohomish, King, Pierce, Thurston, Lewis, Grays Harbor, Mason, Clallam, Jefferson, and Kitsap. Grays Harbor County was excluded because the very small amount of habitat is within the Olympic National Forest.

Table 14 in attachment E shows the acreage information for Washington counties where the Puget Sound chinook salmon ESU is located. In this table, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a low amount of acreage that could potentially be treated with methidathion within this ESU. The estimated potential usage is 493 lbs in this ESU. Given these factors, the likelihood for effects from these uses seems low, but cannot be precluded. Therefore, I conclude that the use of methidathion may affect but is not likely to adversely affect the Puget Sound Chinook Salmon ESU.

(7) Lower Columbia River Chinook Salmon ESU

The Lower Columbia River chinook salmon ESU was proposed as threatened in 1998 (63FR11482-11520, March 9, 1998) and listed a year later (64FR14308-14328, March 24, 1999). Critical habitat was designated February 16, 2000 (65FR7764-7787) to encompass all river reaches accessible to listed chinook salmon in Columbia River tributaries between the Grays and White Salmon Rivers in Washington and the Willamette and Hood River in Oregon, inclusive, along with the lower Columbia River reaches to the Pacific Ocean.

The hydrologic units and upstream barriers are the Middle Columbia-Hood (upstream barriers - Condit Dam, The Dalles Dam), Lower Columbia-Sandy (upstream barrier - Bull Run Dam 2), Lewis (upstream barrier - Merlin Dam), Lower Columbia-Clatskanie, Upper Cowlitz, Lower Cowlitz,

Lower Columbia, Clackamas, and the Lower Willamette. Spawning and rearing habitat would be in the counties of Hood River, Wasco, Columbia, Clackamas, Marion, Multnomah, and Washington in Oregon, and Klickitat, Skamania, Clark, Cowlitz, Lewis, Wahkiakum, and Pacific in Washington. The migration corridors include portions of Clatsop and Columbia Counties in Oregon and Pacific County in Washington.

Note: We have made several changes in the counties included in this ESU. We will be providing details and a rationale in a separate submission to NMFS.

Table 13 in attachment E shows the cropping information for Oregon and Washington counties where the Lower Columbia River chinook salmon ESU occurs. In this table, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a moderate amount of acreage that could potentially be treated with methidathion within this ESU. The bulk of Clackamas County acreage is most likely not in the watershed of this ESU and the total potential usage is a little over 9,000lbs in habitat areas. I conclude that the use of methidathion may affect, but is not likely to adversely affect, the Lower Columbia River Chinook Salmon ESU.

(8) Upper Willamette River Chinook Salmon ESU

The Upper Willamette River Chinook Salmon ESU was proposed as threatened in 1998 (63FR11482-11520, March 9, 1998) and listed a year later (64FR14308-14328, March 24, 1999). Critical habitat was designated February 16, 2000 (65FR7764-7787) to encompass all river reaches accessible to listed chinook salmon in the Clackamas River and the Willamette River and its tributaries above Willamette Falls, in addition to all down stream river reaches of the Willamette and Columbia Rivers to the Pacific Ocean.

The hydrologic units included are the Lower Columbia-Sandy, Lower Columbia- Clatskanie, Lower Columbia, Middle Fork Willamette, Coast Fork Willamette (upstream barriers - Cottage Grove Dam, Dorena Dam), Upper Willamette (upstream barrier - Fern Ridge Dam), McKenzie (upstream barrier - Blue River Dam), North Santiam (upstream barrier – Big Cliff Dam), South Santiam (upstream barrier - Green Peter Dam), Middle Willamette, Yamhill, Molalla-Pudding, Tualatin, Clackamas, and Lower Willamette. Spawning and rearing habitat is in the Oregon counties of Clackamas, Douglas, Lane, Benton, Lincoln, Linn, Polk, Marion, Yamhill, Washington, and Tillamook. However, Douglas, Lincoln and Tillamook counties include salmon habitat only in the forested areas where crop acreage is not meaningful, and were therefore not included in the tables for this ESU. Migration corridors include Clackamas, Multnomah, Columbia, and Clatsop Counties in Oregon,

and Clark, Cowlitz, Wahkiakum, Lewis, and Pacific Counties in Washington.

Table 12 in attachment E shows the cropping information for Oregon counties for the Upper Willamette River chinook salmon ESU spawning and growth and for the Oregon and Washington counties where this ESU migrates. In these tables, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a large amount of acreage that could potentially be treated with methidathion within this ESU. Given the factors of toxicity and the large estimated potential usage in spawning and growing areas, I conclude that the use of methidathion may affect the Upper Willamette River Chinook Salmon ESU within its breeding areas.

(9) Upper Columbia River Spring-run Chinook Salmon ESU

The Upper Columbia River Spring-run Chinook Salmon ESU was proposed as endangered in 1998 (63FR11482-11520, March 9, 1998) and listed a year later (64FR14308-14328, March 24, 1999). Critical habitat was designated February 16, 2000 (65FR7764-7787) to encompass all river reaches accessible to listed chinook salmon in Columbia River tributaries upstream of the Rock Island Dam and downstream of Chief Joseph Dam in Washington, excluding the Okanogan River, as well as all downstream migratory corridors to the Pacific Ocean. Hydrologic units and their upstream barriers are Chief Joseph (Chief Joseph Dam), Similkameen, Methow, Upper Columbia-Entiat, Wenatchee, Upper Columbia-Priest Rapids, Middle Columbia-Lake Wallula, Middle Columbia-Hood, Lower Columbia-Sandy, Lower Columbia-Clatskanie, Lower Columbia, and Lower Willamette. Counties in which spawning and rearing occur are Chelan, Douglas, and Okanogan (Table 48). The lower river reaches are migratory corridors and include Clatsop, Columbia, Gilliam, Hood River, Morrow, Multnomah, Sherman, Umatilla, and Wasco Counties in Oregon, and Benton, Grant, Clark, Cowlitz, Franklin, Kittitas, Klickitat, Skamania, Wahkiakum, Walla Walla, Yakima, and Pacific Counties in Washington (Table 49).

[Note: In previous consultations, we incorrectly included Grant, Kittitas and Benton counties in Washington as part of the spawning and growth habitat. However, these counties are below Rock Island Dam and have been moved to the migratory corridor table.]

Table 11 in attachment E shows the cropping information for Washington counties that support the Upper Columbia River spring-run chinook salmon ESU and for the Oregon and Washington counties where this ESU migrates. In these tables, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a substantial amount of acreage that could potentially be treated with methidathion within

this ESU. Given the factors of the estimated usage of over 30,000 lbs, toxicity of methidathion to aquatic organisms, and that the usage is located in both migratory and spawning and growth areas, I conclude that the use of methidathion may affect the Upper Columbia River Spring-run Chinook Salmon ESU.

(c) Coho Salmon

Coho salmon, *Oncorhynchus kisutch*, were historically distributed throughout the North Pacific Ocean from central California to Point Hope, AK, through the Aleutian Islands into Asia. Historically, this species probably inhabited most coastal streams in Washington, Oregon, and central and northern California. Some populations may once have migrated hundreds of miles inland to spawn in tributaries of the upper Columbia River in Washington and the Snake River in Idaho.

Coho salmon generally exhibit a relatively simple, 3-year life cycle. Adults typically begin their freshwater spawning migration in the late summer and fall, spawn by mid-winter, then die. Southern populations are somewhat later and spend much less time in the river prior to spawning than do northern coho. Homing fidelity in coho salmon is generally strong; however their small tributary habitats experience relatively frequent, temporary blockages, and there are a number of examples in which coho salmon have rapidly recolonized vacant habitat that had only recently become accessible to anadromous fish.

After spawning in late fall and early winter, eggs incubate in redds for 1.5 to 4 months, depending upon the temperature, before hatching as alevins. Following yolk sac absorption, alevins emerge and begin actively feeding as fry. Juveniles rear in fresh water for up to 15 months, then migrate to the ocean as “smolts” in the spring. Coho salmon typically spend two growing seasons in the ocean before returning to their natal stream. They are most frequently recovered from ocean waters in the vicinity of their spawning streams, with a minority being recovered at adjacent coastal areas, decreasing in number with distance from the natal streams. However, those coho released from Puget Sound, Hood Canal, and the Strait of Juan de Fuca are caught at high levels in Puget Sound, an area not entered by coho salmon from other areas.

(1) Central California Coast Coho Salmon ESU

The Central California Coast Coho Salmon ESU includes all coho naturally reproduced in streams between Punta Gorda, Humboldt County, CA and San Lorenzo River, Santa Cruz County, CA, inclusive. This ESU was proposed in 1995 (60FR38011-38030, July 25, 1995) and listed as threatened, with critical habitat designated, on May 5, 1999 (64FR24049-24062). Critical habitat consists of accessible reaches along the coast, including Arroyo Corte Madera Del Presidio and Corte Madera Creek, tributaries to San Francisco Bay.

Hydrologic units within the boundaries of this ESU are: San Lorenzo-Soquel (upstream barrier - Newell Dam), San Francisco Coastal South, San Pablo Bay (upstream barrier – Phoenix Dam-Phoenix Lake), Tomales-Drake Bays (upstream barriers - Peters Dam-Kent Lake; Seeger Dam-Nicasio Reservoir), Bodega Bay, Russian (upstream barriers - Warm springs dam-Lake Sonoma; Coyote Dam-Lake Mendocino), Gualala-Salmon, and Big-Navarro-Garcia. California counties included are Santa Cruz, San Mateo, Marin, Napa, Sonoma, and Mendocino. San Francisco County lies within the north-south boundaries of this ESU, but was not named in the Critical Habitat FR Notice, presumably because there are no coho salmon streams in the county; it is excluded. There is no reported usage of methidathion within this ESU. I conclude that there will be no effect of methidathion on the Central California Coast Coho Salmon ESU

(2) Southern Oregon/Northern California Coast Coho Salmon ESU

The Southern Oregon/Northern California coastal coho salmon ESU was proposed as threatened in 1995 (60FR38011-38030, July 25, 1995) and listed on May 6, 1997 (62FR24588-24609). Critical habitat was proposed later that year (62FR62741-62751, November 25, 1997) and finally designated on May 5, 1999 (64FR24049-24062) to encompass accessible reaches of all rivers (including estuarine areas and tributaries) between the Mattole River in California and the Elk River in Oregon, inclusive.

The Southern Oregon/Northern California Coast coho salmon ESU occurs between Punta Gorda, Humboldt County, California and Cape Blanco, Curry County, Oregon. Major basins with this salmon ESU are the Rogue, Klamath, Trinity, and Eel river basins, while the Elk River, Oregon, and the Smith and Mad Rivers, and Redwood Creek, California are smaller basins within the range. Hydrologic units and the upstream barriers are Mattole, South Fork Eel, Lower Eel, Middle Fork Eel, Upper Eel (upstream barrier - Scott Dam-Lake Pillsbury), Mad-Redwood, Smith, South Fork Trinity, Trinity (upstream barrier - Lewiston Dam-Lewiston Reservoir), Salmon, Lower Klamath, Scott, Shasta (upstream barrier - Dwinnell Dam-Dwinnell Reservoir), Upper Klamath (upstream barrier - Irongate Dam-Irongate Reservoir), Chetco, Illinois (upstream barrier - Selmac Dam-Lake Selmac), Lower Rogue, Applegate (upstream barrier – Applegate Dam-Applegate Reservoir), Middle Rogue (upstream barrier - Emigrant Lake Dam-Emigrant Lake), Upper Rogue (upstream barriers - Agate Lake Dam-Agate Lake; Fish Lake Dam-Fish Lake; Willow Lake Dam-Willow Lake; Lost Creek Dam-Lost Creek Reservoir), and Sixes. Related counties are Humboldt, Mendocino, Trinity, Glenn, Lake, Del Norte, and Siskiyou in California and Curry, Jackson, Josephine, Klamath, and Douglas in Oregon. The habitat in Glenn and Lake Counties, CA is within the Mendocino National Forest, and that in Douglas County, OR is entirely within the Rogue River and Umpqua National Forests. Glenn, Lake, and Douglas Counties are excluded from the crop acreage tables in this analysis.

Note: We previously included Klamath County, OR in this ESU, but have now omitted it because it appears to be entirely above various named upstream barriers. Again we will submit more details in a separate transmittal to NMFS.

The reported methidathion usage in the California counties supporting the Southern Oregon/Northern California coastal coho salmon ESU is shown in table 8 in attachment E. Table 8 in attachment E shows the acreage where methidathion may be used on crops in the Oregon counties where the Southern Oregon/Northern California coastal coho salmon ESU occurs. If there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available. There were no reported crops for methidathion use listed for the northern California coast, therefore the California County bulletins do not apply to the effect determination in this ESU.

There is modest methidathion usage in this ESU mostly on pome fruits only in the southern Oregon region of this ESU. Given the factors of toxicity, and location of usage, I conclude that the use of methidathion may affect, but is not likely to adversely affect, the Southern Oregon/Northern California Coast Coho Salmon ESU.

(3) Oregon Coast coho salmon ESU

The Oregon coast coho salmon ESU was first proposed for listing as threatened in 1995 (60FR38011-38030, July 25, 1995), and listed several years later (63FR42587-42591, August 10, 1998). Critical habitat was proposed in 1999 (64FR24998-25007, May 10, 1999) and designated on February 16, 2000 (65FR7764-7787).

This ESU includes coastal populations of coho salmon from Cape Blanco, Curry County, Oregon to the Columbia River. Spawning is spread over many basins, large and small, with higher numbers further south where the coastal lake systems (e.g., the Tenmile, Tahkenitch, and Siltcoos basins) and the Coos and Coquille Rivers have been particularly productive. Critical Habitat includes all accessible reaches in the coastal hydrologic reaches Necanicum, Nehalem, Wilson-Trask-Nestucca (upstream barrier - McGuire Dam), Siletz-Yaquina, Alsea, Siuslaw, Siltcoos, North Umpqua (upstream barriers - Cooper Creek Dam, Soda Springs Dam), South Umpqua (upstream barrier - Ben Irving Dam, Galesville Dam, Win Walker Reservoir), Umpqua, Coos (upstream barrier - Lower Pony Creek Dam), Coquille, Sixes. Related Oregon counties are Douglas, Lane, Coos, Curry, Benton, Lincoln, Polk, Tillamook, Yamhill, Washington, Columbia, and Clatsop. Benton and Polk counties are primarily part of the Willamette River watershed, but the small parts that may drain into the Pacific Ocean do include agricultural areas, and therefore they are included in the tables.

Table 18 in attachment E shows the acreage where methidathion can be used for Oregon counties

where the Oregon coast coho salmon ESU occurs. In this table, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is modest crop acreage in the coastal watersheds of the counties within this ESU. There is no usage reported in many counties however, the amount that is used is in habitat areas. Therefore, along with the factor of toxicity, I conclude that the use of methidathion may affect, but is not like to adversely affect the Oregon Coast Coho Salmon ESU.

(d) Chum Salmon

Chum salmon, *Oncorhynchus keta*, have the widest natural geographic and spawning distribution of any Pacific salmonid, primarily because its range extends farther along the shores of the Arctic Ocean. Chum salmon have been documented to spawn from Asia around the rim of the North Pacific Ocean to Monterey Bay in central California. Presently, major spawning populations are found only as far south as Tillamook Bay on the northern Oregon coast.

Most chum salmon mature between 3 and 5 years of age, usually 4 years, with younger fish being more predominant in southern parts of their range. Chum salmon usually spawn in coastal areas, typically within 100 km of the ocean where they do not have surmount river blockages and falls. However, in the Skagit River, Washington, they migrate at least 170 km. During the spawning migration, adult chum salmon enter natal river systems from June to March, depending on characteristics of the population or geographic location. In Washington, a variety of seasonal runs are recognized, including summer, fall, and winter populations. Fall-run fish predominate, but summer runs are found in Hood Canal, the Strait of Juan de Fuca, and in southern Puget Sound, and two rivers in southern Puget Sound have winter-run fish.

Redds are usually dug in the mainstem or in side channels of rivers. Juveniles migrate out to seawater almost immediately after emerging from the gravel that covers their redds. This means that survival and growth in juvenile chum salmon depend less on freshwater conditions than on favorable estuarine and marine conditions.

(1) Hood Canal Summer-run Chum Salmon ESU

The Hood Canal summer-run chum salmon ESU was proposed for listing as threatened, and critical habitat was proposed, in 1998 (63FR11774-11795, March 10, 1998). The final listing was published a year later (63FR14508-14517, March 25, 1999), and critical habitat was designated in 2000 (65FR7764-7787).

Critical habitat for the Hood Canal ESU includes Hood Canal, Admiralty Inlet, and the straits of Juan de Fuca, along with all river reaches accessible to listed chum salmon draining into Hood Canal as well as Olympic Peninsula rivers between Hood Canal and Dungeness Bay, Washington. The hydrologic units are Skokomish (upstream boundary - Cushman Dam), Hood Canal, Puget Sound, Dungeness-Elwha, in the counties of Mason, Clallam, Jefferson, Kitsap, Island, and Grays Harbor. Grays Harbor County was excluded because the very small amount of habitat is within the Olympic National Forest.

Streams specifically mentioned, in addition to Hood Canal, in the proposed critical habitat Notice include Union River, Tahuya River, Big Quilcene River, Big Beef Creek, Anderson Creek, Dewatto River, Snow Creek, Salmon Creek, Jimmycomelately Creek, Duckabush 'stream,' Hamma Hamma 'stream,' and Dosewallips 'stream.'

Table 17 in attachment E shows the acreage of crops in these counties on which methidathion can be used. In this table, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a low amount of methidathion used within this ESU. Given the location of the use of methidathion in habitat areas and the potential usage is less than 200 lbs, the likelihood for effects from these uses seems low enough that I conclude that the use of methidathion will have no effect on the Hood Canal Summer-run Chum Salmon ESU.

(2) Columbia River Chum Salmon ESU

The Columbia River chum salmon ESU was proposed for listing as threatened, and critical habitat was proposed, in 1998 (63FR11774-11795, March 10, 1998). The final listing was published a year later (63FR14508-14517, March 25, 1999), and critical habitat was designated in 2000 (65FR7764-7787).

Critical habitat for the Columbia River chum salmon ESU encompasses all accessible reaches and adjacent riparian zones of the Columbia River (including estuarine areas and tributaries) downstream from Bonneville Dam, excluding Oregon tributaries upstream of Milton Creek at river km 144 near the town of St. Helens. These areas are the hydrologic units of Lower Columbia-Sandy (upstream barrier - Bonneville Dam), Lewis (upstream barrier - Merlin Dam), Lower Columbia-Clatskanie, Lower Cowlitz, Lower Columbia, Lower Willamette in the counties of Clark, Skamania, Cowlitz, Wahkiakum, Pacific, Lewis, Washington and Multnomah, Clatsop, Columbia, and Washington, Oregon. It appears that there are three extant populations in Grays River, Hardy Creek, and Hamilton Creek. Because the ESU extends on the Oregon side only up to Milton Creek, and because we cannot see that Milton Creek reaches into Washington County, we have excluded

Washington County from this ESU. Washington County was named in the Critical Habitat FR Notice. It appears that the Washington County connection with the hydrologic unit is with the Willamette River which is upstream from Milton Creek. We solicit NMFS comment.

Table 16 in attachment E shows the cropping information for Oregon and Washington counties where the Columbia River chum salmon ESU occurs. In this table, if there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a low amount of methidathion used within this ESU. Breeding populations are known in Skamania County and Pacific/Wahkiakum counties, where there is negligible use of methidathion. Based on the known location of breeding populations, I conclude that there will be no effect from methidathion on the Columbia River Chum Salmon ESU.

(e) Sockeye Salmon

Sockeye salmon, *Oncorhynchus nerka*, are the third most abundant species of Pacific salmon, after pink and chum salmon. Sockeye salmon exhibit a wide variety of life history patterns that reflect varying dependency on the fresh water environment. The vast majority of sockeye salmon typically spawn in inlet or outlet tributaries of lakes or along the shoreline of lakes, where their distribution and abundance is closely related to the location of rivers that provide access to the lakes. Some sockeye, known as kokanee, are non-anadromous and have been observed on the spawning grounds together with their anadromous counterparts. Some sockeye, particularly the more northern populations, spawn in mainstem rivers. Growth is influenced by competition, food supply, water temperature, thermal stratification, and other factors, with lake residence time usually increasing the farther north a nursery lake is located. In Washington and British Columbia, lake residence is normally 1 or 2 years. Incubation, fry emergence, spawning, and adult lake entry often involve intricate patterns of adult and juvenile migration and orientation not seen in other *Oncorhynchus* species.

Upon emergence from the substrate, lake-type sockeye salmon juveniles move either downstream or upstream to rearing lakes, where the juveniles rear for 1 to 3 years prior to migrating to sea. Smolt migration typically occurs beginning in late April and extending through early July.

Once in the ocean, sockeye salmon feed on copepods, euphausiids, amphipods, crustacean larvae, fish larvae, squid, and pteropods. They will spend from 1 to 4 years in the ocean before returning to freshwater to spawn. Adult sockeye salmon home precisely to their natal stream or lake. River- and sea-type sockeye salmon have higher straying rates within river systems than lake-type sockeye salmon.

(1) Ozette Lake Sockeye Salmon ESU

The Ozette Lake sockeye salmon ESU was proposed for listing, along with proposed critical habitat, in 1998 (63FR11750-11771, March 10, 1998). It was listed as threatened on March 25, 1999 (64FR14528-14536), and critical habitat was designated on February 16, 2000 (65FR7764-7787). This ESU spawns in Lake Ozette, Clallam County, Washington, as well as in its outlet stream and the tributaries to the lake. It has the smallest distribution of any listed Pacific salmon.

While Lake Ozette itself is part of Olympic National Park, its tributaries extend outside park boundaries, much of which is private land. There is limited agriculture in the whole of Clallam County. Table 15 in attachment E shows acreage within this county for crops where methidathion can be used.

There is very little methidathion used within this ESU. Given that of the 1800 potential acres treated only 74lbs of methidathion was used, I conclude that there will be no effect of methidathion on the Ozette Lake Sockeye Salmon ESU.

(2) Snake River Sockeye Salmon ESU

The Snake River sockeye salmon was the first salmon ESU in the Pacific Northwest to be listed. It was proposed and listed in 1991 (56FR14055-14066, April 5, 1991 & 56FR58619-58624, November 20, 1991). Critical habitat was proposed in 1992 (57FR57051-57056, December 2, 1992) and designated a year later (58FR68543-68554, December 28, 1993) to include river reaches of the mainstem Columbia River, Snake River, and Salmon River from its confluence with the outlet of Stanley Lake down stream, along with Alturas Lake Creek, Valley Creek, and Stanley, Redfish, Yellow Belly, Pettit, and Alturas lakes (including their inlet and outlet creeks).

Spawning and rearing habitats are considered to be all of the above-named lakes and creeks, even though at the time of the critical habitat Notice, spawning only still occurred in Redfish Lake. These habitats are in Custer and Blaine counties in Idaho. However, the habitat area for the salmon is high elevation areas in a National Wilderness area and National Forest. The migratory corridors are larger rivers and any exposure during migration should be lessened.

Table 23 in attachment E shows the acreage of crops in counties containing habitat and migratory corridors for this ESU. If there is no acreage given for a specific crop, this means that there are too few growers in the area for USDA to make the data available.

There is a large amount of acreage that could potentially be treated with methidathion within this ESU. There is a potential for over 20,000 lbs to be used in migratory areas and 1500 lbs in spawning

and growth areas. Given these factors, there is a likelihood for effects even in migratory areas. I conclude that the use of methidathion may affect the Snake River sockeye salmon ESU.

5. Specific conclusions for Pacific salmon and steelhead ESUs

The areas of concern for methidathion are primarily those in the Pacific northwest. The concerns are sufficient to trigger the need for formal or informal consultation for many ESUs, but not so pronounced as to expect significant effects, even on many individuals, let alone on populations. I recommend that OPP develop county bulletins for use in the Pacific northwest states and that protections be developed in conjunction with these states. It has been OPP policy to work with states, even those without specific programs, to develop implementation methods that have a high potential to be effective within each state. It may be that the WSDA Task Force, which has been working with the Service already, will be in a good position to assist in the development of any necessary mitigation. Of course, such an approach is also open to Oregon and Idaho, although we are not aware of any programs in those states to work with the Service on these pesticide issues, other than very specific ones included in the Service’s 4d rules.

Because I believe that even the current, non-enforceable California bulletins are sufficient to make adverse effects unlikely and given that these are anticipated to become enforceable, there is no specific need for additional protective measures in California. However, as OPP’s program becomes final, it seems appropriate to re-evaluate the protections in these bulletins, and make any adjustments, as necessary, in conjunction with the Service and DPR.

Table 21. Summary Conclusions on Specific ESUs of Salmon and Steelhead for Methidathion^a

Species	ESU	finding
Chinook Salmon	Upper Columbia spring-run	may affect
Chinook Salmon	Snake River spring/summer-run	may affect
Chinook Salmon	Snake River fall-run	may affect
Chinook Salmon	Upper Willamette	may affect

Chinook Salmon	Lower Columbia	may affect, but not likely to adversely affect
Chinook Salmon	Puget Sound	may affect, but not likely to adversely affect
Chinook Salmon	California Coastal	no effect
Chinook Salmon	Central Valley spring-run	may affect, but not likely to adversely affect
Chinook Salmon	Sacramento River winter-run	may affect, but not likely to adversely affect
Coho salmon	Oregon Coast	may affect, but not likely to adversely affect
Coho salmon	Southern Oregon/Northern California Coast	may affect, but not likely to adversely affect
Coho salmon	Central California	no effect
Chum salmon	Hood Canal summer-run	no effect
Chum salmon	Columbia River	no effect
Sockeye salmon	Ozette Lake	no effect
Sockeye salmon	Snake River	may affect
Steelhead	Snake River Basin	may affect
Steelhead	Upper Columbia River	may affect
Steelhead	Middle Columbia River	may affect
Steelhead	Lower Columbia River	may affect, but not likely to adversely affect
Steelhead	Upper Willamette River	may affect
Steelhead	Northern California	no effect
Steelhead	Central California Coast	may affect, but not likely to adversely affect
Steelhead	South-Central California	may affect, but not likely to adversely affect
Steelhead	Southern California	no effect

Steelhead	Central Valley, California	may affect
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a. With respect to crop uses for acute effects in breeding and rearing areas. See initial paragraph of this section.

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